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October 13, 2005

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

**Re: APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
CARRIER IN THE STATE OF FLORIDA — CONFIDENTIAL
TREATMENT REQUESTED**

Dear Ms. Dortch:

Alltel Communications, Inc. ("Alltel"), by its attorneys, hereby submits an original and four redacted copies of Alltel's Application for Designation as an Eligible Telecommunications Carrier in the State of Florida ("Application"). Alltel is simultaneously submitting a confidential copy of this filing. As such, Alltel requests confidential treatment under Section 0.459 of the Commission's rules¹ regarding Exhibit D (Alltel's Five-Year Service Improvement Plan) provided as an attachment to Alltel's Application. This attachment is labeled "Confidential — Not for Public Inspection."

Exhibit D contains proprietary company information not available to the public, including information that is competitively sensitive about Alltel's future plans for building out its network.

As required by Section 0.459(b) of the Commission's rules, Alltel provides the following information regarding its request for confidential treatment:

1. Confidential treatment is requested for all information contained in Exhibit D.
2. This information is submitted as an attachment to Alltel's Application being filed in the Commission's universal service docket, CC Docket No. 96-45.
3. The information being submitted is commercially and financially sensitive and is privileged. Exhibit D provides detailed financial information regarding how Alltel intends to spend its universal service funds in certain wire centers over the next five

¹ 47 C.F.R. § 0.459.

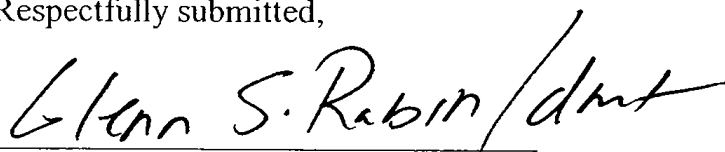
years. Also, Alltel is providing in Exhibit D general information as how it intends to spend this funding, (*i.e.*, for capacity or coverage enhancements).

4. The wireless industry is highly competitive.²
5. The release of such information will cause substantial competitive harm to Alltel. Disclosure of Alltel's five-year plans for its expenditures of universal service funds would give Alltel's competitors access to privileged information that would affect the actions of those competitors. Competitors seeking to compete with Alltel could upgrade their networks in an attempt to, for example, preempt Alltel's planned upgrades. Also, by providing information about where Alltel intends to expand coverage, Alltel could expose itself to predatory practices by tower owners and potential tower site owners in areas where it committed to add cell sites.
6. Alltel considers the information in Exhibit D to be proprietary and confidential and does not distribute such information to any party outside of the company, with the exception of outside counsel.
7. The information in Exhibit D is not available to the public and has not been disclosed to any other third party, with the exception of outside counsel.
8. The information provided in Exhibit D should never be released for public inspection, as this document contains proprietary company information that is competitively and financially sensitive. Even after the five-year term of the plan expires, Alltel would not reveal to its competitors the amount of money it has spent in the past in certain wire centers.

For the foregoing reasons, Alltel respectfully requests that the Commission allow for confidential treatment of Exhibit D.

If you have any questions regarding this supplemental information or the confidentiality request, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads "Glenn S. Rabin" followed by a stylized flourish or initials.

Glenn S. Rabin
Vice President
Federal Communications Counsel

² See *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, Eighth Report*, 18 F.C.C.R. 14783, 14812 (2003) ("Continued downward price trends, the continued expansion of mobile networks into new and existing markets, high rates of investment, and churn rates of about 30%, when considered together with the other metrics, demonstrate a high level of competition for mobile telephone consumers."); *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, Ninth Report*, 19 F.C.C.R. 20597, 20600-01 (2004) ("[C]ompetition is robust in terms of the current number of competitors per market ..." and "[i]ndicators of market performances show that competition continues to afford many significant benefits to consumers.").

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C.**

In the Matter of)	
)	
Application of Alltel Communications, Inc.)	
)	Docket No. 96-45
)	
For Designation as an Eligible)	
Telecommunications Carrier Pursuant To)	
Section 214(e)(6) of the Communications)	
Act of 1934)	

**APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF FLORIDA**

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Date: October 13, 2005

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**APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF FLORIDA**

Alltel Communications, Inc., on behalf of itself and its wholly-owned and controlled licensee affiliates (“Alltel” or “Company”), and pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the “Act”), hereby petitions the Commission for designation as an Eligible Telecommunications Carrier (“ETC”) in the rural telephone company areas within its licensed service area in the State of Florida (“Application”). By Order issued September 24, 2004 the Commission designated Alltel ETC status in the non-rural telephone company wire centers within its licensed service area.¹ As demonstrated below, Alltel meets all the statutory and regulatory prerequisites for ETC designation in the rural telephone company areas, and Alltel’s designation will serve the public interest.

¹ *Federal-State Joint Board on Universal Service; ALLTEL Communications Inc., Petitions for Designation as an Eligible Telecommunications Carriers in the States of Alabama, Florida, Georgia, North Carolina, and Virginia*, Order, 19 FCC Rcd 20496 (WCB 2004) (“*Alltel Non-Rural Designation Order*”).

I. Alltel's Universal Service Offering.

Alltel is the licensee authorized to provide cellular mobile radio telephone service in the following Cellular Market Areas ("CMA") in Florida: CMA 43, CMA 47, CMA 61, CMA 71, CMA 149, CMA 166, CMA 218, CMA 258, CMA 280, CMA 566, CMA 568, CMA 569, CMA 570, CMA 571, CMA 572, CMA 573, CMA 574, CMA 575, CMA 576, CMA 577, CMA 578 and CMA 579.² Alltel intends to obtain high-cost support in the rural telephone company areas to expand its coverage to include unserved or underserved areas, to increase the service quality and reliability of its network, and to speed the delivery of advanced wireless services to the citizens of Florida. As an ETC, Alltel will also offer a basic universal service package to subscribers who are eligible for Lifeline support and will offer Link-Up to eligible subscribers. Alltel's service offering will be competitive with those of the incumbent local exchange carriers ("LECs").

II. Alltel Satisfies All the Statutory and Regulatory Prerequisites for Designation as an ETC.

Alltel satisfies each of the elements enumerated by the Commission for ETC designation pursuant to Section 214(e)(6) of the Act as set forth in the FCC's *Section 214(e)(6) Public Notice*.³

A. The Florida Public Service Commission Has Provided an Affirmative Statement That It Does Not Regulate CMRS Carriers.

As a CMRS carrier, Alltel is entitled to seek designation as an ETC.⁴ Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section

² The areas that Alltel seeks for designation within its licensed area will be referred to in this document as the "ETC Service Area."

³ FCC Public Notice, *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, 12 FCC Rcd 22947 (1997) ("*Section 214(e)(6) Public Notice*").

214(e) shall be eligible to receive specific federal universal service support.”⁵ Pursuant to Section 214(e)(6) of the Act, the Commission may, upon request, designate as an ETC “a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a state commission.”⁶

In the *Section 214(e)(6) Public Notice*, the Commission established that a carrier must demonstrate it “is not subject to the jurisdiction of a state commission.”⁷ In its *Twelfth Report and Order*, the Commission stated that where a carrier provides the Commission with an “affirmative statement” from the state commission or a court of competent jurisdiction that the state lacks jurisdiction to perform the designation, the Commission would consider requests filed pursuant to 214(e)(6).⁸

On April 29, 2003, Alltel Communications, Inc. filed a Petition for Declaratory ruling with the Florida Public Service Commission (“FPSC”) seeking an affirmative statement from the FPSC that it lacked jurisdiction to grant Alltel, a CMRS carrier, ETC status for purposes of receiving federal universal service support. By vote on August 19, 2004, the FPSC concluded that it lacked jurisdiction over CMRS carriers such as Alltel and that the FPSC could not determine whether Alltel was eligible for ETC status under Section 214(e) of the Act and the

⁴ See *Federal-State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8858-59 (1997) (“*First Report and Order*”).

⁵ 47 U.S.C. § 254(e).

⁶ 47 U.S.C. § 214(e)(6).

⁷ *Section 214(e)(6) Public Notice*, 12 FCC Rcd at 22948.

⁸ *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, Twelfth Report and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12264 (2000).

Commission's rules. Copies of the FPSC Agenda Vote Sheet and a Declaratory Statement explaining the FPSC's decision are attached to this application as Exhibit B.⁹

B. Alltel Offers All of the Services Supported By the Federal High-Cost Universal Service Program.

In order to be designated as an ETC, a carrier must be a common carrier and both offer and advertise the supported services throughout the designated service area.¹⁰ The FCC has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms:¹¹

1. Voice-grade access to the public switched telephone network;
2. Local usage;
3. Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent;
4. Single-party service or its functional equivalent;
5. Access to emergency services;
6. Access to operator services;
7. Access to interexchange service;
8. Access to directory assistance; and
9. Toll limitation for qualifying low-income consumers.

The *Section 214(e)(6) Public Notice* requires a carrier to certify that it provides each of the supported services, or where appropriate, functionally equivalent services.¹² As shown below and in the Declaration attached as Exhibit A hereto, Alltel currently provides, or will provide upon designation, each of the required services.

⁹ The FCC previously has processed ETC petitions in Florida. *See, e.g., Alltel Non-Rural Designation Order*, *supra* n.1.

¹⁰ 47 U.S.C. § 214(e)(1).

¹¹ *See* 47 C.F.R. § 54.101(a).

¹² *Section 214(e)(6) Public Notice*, 12 FCC Rcd at 22948.

1. Voice-grade access to the public switched telephone network:

The FCC concluded that voice-grade access means the ability to make and receive phone calls within a specified bandwidth.¹³ Alltel meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with LECs, each of Alltel's customers is able to make and receive calls on the public switched telephone network within the specified bandwidth.

2. Local usage:

Section 54.202(a)(4) of the FCC's rules require an ETC applicant to "demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation."¹⁴ The FCC has explained that an ETC applicant's local usage plans should be reviewed on a case-by-case basis to ensure that each ETC provides a local usage component in its universal service offering that is comparable to the plan offered by the incumbent LEC in the area.¹⁵ The FCC has declined to adopt a specific local usage threshold.¹⁶ Alltel commits to provide rate plans that have a substantial local calling area with a corresponding level of included local usage that provides an outstanding consumer value. A description of Alltel's current rate plans that are available in the areas for which Alltel seeks ETC designation is attached as Exhibit C hereto. Exhibit C confirms that Alltel includes local usage in each rate plan and that Alltel offers local calling areas that are substantially larger than those offered by the incumbent LECs. Further, since Alltel offers several rate plans as its

¹³ *First Report and Order*, 12 FCC Rcd at 8810-11.

¹⁴ 47 C.F.R. § 54.202(a)(4).

¹⁵ *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005) ("ETC Criteria Order").

¹⁶ *Id.* at 6385.

universal service offering, customers have the opportunity to select a rate plan that best meets their needs based on the local calling areas and the amount of local calling included in each plan.

3. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent:

DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement.¹⁷ Alltel currently uses out-of-band digital signaling, and Alltel therefore meets this requirement.

4. Single-party service or its functional equivalent:

“Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line.¹⁸ The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission.¹⁹ Alltel meets the requirement of single-party service in this manner.

5. Access to emergency services:

The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Alltel currently provides its customers with access to emergency services by dialing 911 in accord with this requirement throughout the geographic area where it is seeking ETC designation. Further, Alltel provides both automatic numbering information (“ANI”) and automatic location information (“ALI”) to public emergency service

¹⁷ 47 C.F.R. § 54.101(a)(3).

¹⁸ *First Report and Order*, 12 FCC Rcd at 8810.

¹⁹ *Id.*

providers capable of both receiving and utilizing the data and has made arrangements for the delivery of the data.

6. Access to operator services:

Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call.²⁰ Alltel meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (*e.g.* LECs, IXC, etc.)

7. Access to interexchange service:

A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Alltel presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements between the Company and several IXCs. On most of the Company's rate plans, interexchange calls can be made for no additional charge (*i.e.*, all outgoing minutes are treated the same). Additionally, customers are able to reach other IXCs by dialing the appropriate access code or dial-around number.

8. Access to directory assistance:

The ability to place a call to directory assistance is a required service offering.²¹ Alltel meets this requirement by providing all of its customers with access to directory assistance by dialing either "411" or "Area Code + 555-1212."

²⁰ *Id.* at 8817-18.

²¹ *Id.* at 8821.

9. Toll limitation for qualifying low-income consumers:

An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service.²² In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls.²³ Once designated as an ETC, Alltel will participate in Lifeline as required and will provide toll blocking capability in satisfaction of the FCC’s requirement. Alltel currently has the capability to provide toll blocking and will provide this service at no charge to its Lifeline customers.

C. Alltel Meets the Additional Eligibility Criteria Adopted by the FCC in the ETC Criteria Order.

The FCC’s March 17, 2005 *ETC Criteria Order* established additional criteria that all ETC applicants must satisfy in order to be granted ETC status. The FCC found that an ETC applicant must demonstrate: (1) a commitment and ability to provide the supported services throughout the designated area; (2) the ability to remain functional in emergency situations; (3) that it will satisfy consumer protection and service quality standards; (4) that it offers local usage comparable to that offered by the incumbent LEC; and (5) an understanding that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to Section 214(e)(4) of the Act.²⁴

1. Commitment and Ability to Provide the Supported Services:

Section 54.202(a)(1) of the FCC’s rules require an ETC applicant to demonstrate its commitment and ability to provide the supported services throughout the designated service area by: (a) committing to provide service throughout its proposed ETC designated service

²² 47 C.F.R. § 54.101 (a)(9); see *Federal-State Joint Board Universal Service*, Fourth Order on Reconsideration, 13 FCC Rcd 5318, 5388 (1997).

²³ *First Report and Order*, 12 FCC Rcd at 8821-22.

area to all potential customers making a reasonable request for service; and (b) submitting a five-year plan demonstrating how high-cost universal service support will be used to improve the Company's coverage, service quality and capacity throughout the service area for which it seeks ETC designation.

a. Commitment to Serve All Customers Making a Reasonable Request for Service:

Alltel certifies that: (1) it will provide service throughout the proposed ETC area using its standard customer equipment and service offerings where available; or (2) if a request within Alltel's licensed service area but outside its existing network coverage is received from a potential customer, Alltel will follow the steps described in Section 54.202(a)(1)(a) of the FCC's rules. If, after following the steps specified therein, Alltel still cannot provide service, it will notify the requesting party and report the unfulfilled request to the Commission within 30-days after making such a determination. Furthermore, consistent with the requirement in Section 54.209(a)(3) of the FCC's rules, Alltel will annually report the number of requests from potential customers that were unfulfilled during the pervious year. Alltel submits that the above described service provisioning commitments satisfy the FCC's requirements in Section 54.202(a)(1)(a) and ensures that Alltel is responsive to consumers' needs in the ETC Service Area, while acting as a proper steward of available high-cost support funds.

b. Five-Year Service Improvement Plan:

Alltel submits its proposed five-year service improvement plan ("Plan"), attached hereto as Exhibit D, is in accordance with Section 54.202(a)(1)(b) of the FCC's rules. Alltel's Plan contains highly confidential information, and therefore, will be submitted separately in accordance with Section 0.459 of the Commission's rules. The Plan describes projected improvements in both the previously approved non-rural areas and the rural areas in which Alltel

²⁴ See *ETC Criteria Order*, 20 FCC Rcd at 6386-87.

seeks ETC designation in this Application. The capital expenditures in the Plan represent substantially greater levels of financial commitment than Alltel would commit in the absence of high-cost support. As represented in the Plan, Alltel also will incur expenses associated with upgrading, maintaining and operating its existing network in the ETC designated areas, which is an equally appropriate use of high-cost funds. Alltel submits that these plans must be flexible and are subject to change in response to general consumer demand, changes in technology and other appropriate factors. The priority under which each cell site is to be constructed is subject to change depending upon requests for service and other market factors. Alltel also commits to annually provide the Commission a progress report consistent with Section 54.209(a)(1) of the FCC's rules. Alltel believes the five-year plan attached hereto as Exhibit D satisfies the requirements of the FCC's rules and constitutes a good faith estimate of the universal service benefits – due to expanded coverage and improved signal and service quality – that rural and non-rural customers in the state of Florida will enjoy if the Commission designates Alltel as an ETC in the requested areas.

2. Ability to Remain Functional in Emergency Situations:

Alltel is able to remain functional in emergency situations. Alltel's network is designed to remain functional in emergency situations. Alltel has adequate amounts of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergency situations.²⁵

Alltel has deployed fixed and portable back-up power generators at various locations throughout its network that can be deployed in emergency situations. These back-up power generators are capable of keeping a cell site up and running until power is restored to the

²⁵ See 47 C.F.R. § 54.202(a)(2).

cell site, until system changes are made to reroute traffic or until a cell site on wheels (“COWs”) is deployed. Alltel tests its back-up power generators regularly to ensure functionality. Alltel is capable of and will reroute traffic around damaged or out-of-service facilities by changing call routing translations as needed. Alltel also is able to deploy COWs as temporary cell sites when existing facilities are damaged or out of service for longer periods of time. Further, by changing call routing translations or deploying COWs, Alltel is able to manage traffic spikes throughout its network. As a long-term solution for managing increased traffic levels and traffic spikes, Alltel will increase capacity at its cell sites, switches and transport facilities.

Finally, in accordance with Section 54.209(a)(6) of the FCC’s rules, Alltel will annually certify that it is able to function in emergency situations. Alltel also will fulfill the annual outage reporting requirement described in Section 54.209(a)(2) of the FCC’s rules. Section 54.209(a)(2) of the FCC’s rules requires an ETC applicant to submit detailed information on any outage of at least 30 minutes in duration that potentially affects (a) at least ten percent of the end users served in a designated service area; or (b) a 911 special facility. Specifically, such a report must include information detailing: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the particular services affected; (d) the geographic areas affected by the outage; (e) steps taken to prevent a similar situation in the future; and (f) the number of customers affected.²⁶

3. Consumer Protection:

Section 54.202(a)(3) of the FCC’s rules states that an ETC applicant must “demonstrate that it will satisfy applicable consumer protection and service quality standards.”²⁷ A commitment by wireless applicants to comply with the Cellular Telecommunications and

²⁶ See 47 C.F.R. § 54.209(a)(2).

²⁷ 47 C.F.R. § 54.202(a)(3).

Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") will satisfy this requirement. Other commitments will be considered on a case-by-case basis. Alltel has already committed to abide by the CTIA Consumer Code for its entire wireless operations across the country, not simply those states in which it seeks ETC status. Although its commitment to this Code goes well beyond a simple inducement to the Commission for the grant of ETC status, Alltel specifically commits that, as an ETC, Alltel will abide by the CTIA Consumer Code with respect to its ETC Service Area.²⁸

In addition to its commitment to the CTIA Consumer Code, Alltel has taken several steps, on its own initiative, to further protect its customers and enhance service quality. For example, Alltel offers its customers an automatic one-minute credit for all dropped calls on its network. Alltel does not require a customer to call and report such instances. Instead, Alltel monitors its network for dropped calls and automatically credits customers' accounts for dropped calls. In another initiative, in recognition of the fact that changing circumstances and needs may require customers to opt for a different rate plan, Alltel offers its customers the ability to change rate plans at anytime without extending their current service contracts. These are two initiatives taken by Alltel to further protect its customers. As noted, if designated as an ETC, Alltel will satisfy the requirements in Sections 54.209(a)(5) and 54.209(a)(4) by annually certifying its compliance with the CTIA Consumer Code and annually reporting the number of customer complaints per thousand handsets.

4. Local Usage:

As described Section II.B.2 of this Application and as demonstrated in Exhibit C hereto, Alltel is committed to offering local usage plans comparable to those offered by the incumbent LEC in the service areas for which it seeks designation. Each of Alltel's service plans

²⁸ Alltel recently re-certified its compliance with the CTIA Consumer Code.

described in Exhibit C are within the scope of “comparability” as defined by the FCC in the *ETC Criteria Order*.²⁹ Further, Alltel will annually certify that it offers local usage plans that are comparable to those offered by the incumbent LEC in the relevant areas in accordance with Section 54.209(a)(7) of the FCC’s rules.

5. Equal Access:

In accordance with Section 54.202(a)(5) of the FCC’s rules, Alltel acknowledges that the Commission may require it to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within the designated ETC Service Area.³⁰ Further, pursuant to Section 54.209(a)(8), Alltel will file an annual certification acknowledging the fact that it may be required to provide equal access to long-distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

D. Alltel Will Offer Supported Services Using a Combination of its Own Facilities and Resale of Another Carrier’s Services.

The Commission’s *Section 214(e)(6) Public Notice* established that a carrier requesting designation must certify that it offers the supported services “either using its own facilities or a combination of its own facilities and resale of another carrier’s services.”³¹ Alltel will provide the supported services using its own network infrastructure, consisting of antennas, cell sites, towers, trunkings, mobile switching and interconnection facilities. Alltel may, on a limited basis, provide service through resale of another carrier’s service in areas lacking adequate coverage. *See also* Exhibit A.

²⁹ *ETC Criteria Order*, 20 FCC Rcd at 6385.

³⁰ 47 C.F.R. § 54.202(a)(5).

³¹ *Section 214 Public(e)(6) Public Notice*, 12 FCC Rcd at 22949.

E. Alltel Will Advertise its Universal Service Offering.

Alltel will advertise the availability of the supported services and the corresponding charges in a manner that fully informs the general public within the ETC Service Area of both the available services and the associated rates.³² Alltel currently advertises its services through a variety of advertising media, including newspapers, television, radio, public exhibits and displays, and the Company website. Alltel will utilize the same media to advertise the universal service offerings throughout the ETC Service Area. Further, Alltel commits to advertise the availability of Lifeline and Link-Up discounts throughout the ETC Service Area.

III. Alltel Requests ETC Designation in the “Rural” Study Areas Within its Licensed Service Area in the State of Florida.

Alltel, in its capacity as a provider of cellular services, is not a “rural telephone company” as that term is defined by 47 U.S.C. Section 153(37). Accordingly, Alltel is required to describe the geographic area in which it requests designation.³³ In this Application, Alltel requests ETC designation in the “rural” study areas depicted on the maps attached hereto as Exhibits E, F-2, G-2 and listed in Exhibits F and G, within its licensed service area in the State of Florida.³⁴

Pursuant to Section 54.207 of the Commission’s rules, a “service area” is a “geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms.”³⁵ In an area served by a rural telephone company, the Commission’s rules define “service area” to mean the LEC study area unless a different

³² *See id.*

³³ *Id.*

³⁴ As noted above, Alltel previously was designated as an ETC in the non-rural portions of its licensed territory in Florida. *See supra* n.1.

³⁵ 47 C.F.R. § 54.207(a).

definition of service area is established for such company.³⁶ The rural ILEC study areas that Alltel serves in their entirety are set forth in Exhibit F attached hereto. The maps attached hereto as Exhibits F-1 and F-2 confirm that the rural study areas identified in Exhibit F are entirely within Alltel's licensed area. The Commission may designate Alltel as an ETC in those areas upon a finding that such designation is in the public interest (see Section V below).³⁷

In situations where Alltel is not licensed to serve a rural ILEC study area in its entirety, Alltel may be designated as an ETC once the Commission redefines the ILEC's service area in accordance with Section 54.207(c)(1) of the FCC's rules. As set forth in Section IV below, Alltel requests a redefinition of those rural ILEC study areas that it partially serves on a wire center by wire center basis. Where Alltel is not licensed to serve a rural ILEC study area in its entirety, Alltel requests that it be designated as an ETC only in those wire centers in which it provides service in its entirety. The wire centers that are not served or are only partially served within the rural ILECs' study areas are identified in Exhibits G and G-2 and should be excluded from Alltel's ETC Service Area.³⁸ Accordingly, where Alltel serves only a portion of a wire center, it does not request ETC status for that wire center. Since the FPSC does not assert jurisdiction over CMRS carriers, including the designation of a cellular carrier as an ETC,³⁹ the Commission has jurisdiction to consider a redefinition of the ILEC service areas in Florida for ETC purposes, as set forth in Section IV below.

³⁶ See 47 C.F.R. § 54.207(b); *see also Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers*, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking, 16 FCC Rcd 11244 (2001) ("MAG Fourteenth Report and Order").

³⁷ 47 U.S.C. § 214(e)(2).

³⁸ In column four of Exhibit G, "Yes" indicates that Alltel serves the applicable wire center in its entirety, and "No" indicates that Alltel either does not serve or only partially serves the applicable wire center.

³⁹ See Exhibit B.

IV. Alltel Requests that Affected Rural LEC Service Areas be Redefined.

Alltel requests that the Commission redefine the service areas of Alltel Florida, Inc.⁴⁰ and Sprint Florida, Inc. (“Rural LECs”) on a wire center by wire center basis. However, to the extent that redefinition already has been granted in the above service areas to other carriers, the redefinition request should be treated as moot under the terms of the *Epic Touch Public Notice*.⁴¹

Absent redefinition of these service areas, Alltel would be prohibited from being designated as a competitive ETC in any of the wire centers within these rural telephone company study areas where it can serve today. Redefinition of the service areas identified in Exhibits G, G-1 and G-2 on a wire center by wire center basis will foster competition and offer customers in the exchanges that are served by Alltel a competitive universal service offering. Further, redefinition of these areas will serve the public interest by bringing the benefits described in Section V to the areas that Alltel is licensed to serve.

Pursuant to Section 54.207(b)-(c) of the Commission’s rules,⁴² a petition to redefine a rural LEC service area must include an analysis that takes into account the recommendations of the Federal-State Joint Board convened to provide recommendations with respect to the definition of a service area served by a rural telephone company. The *ETC Criteria Order* did not amend Section 54.207; this decision, however, added new Section 54.202(c) to the rules, which specifies that “in instances where an [ETC] applicant seeks designation below the study

⁴⁰ Alltel Florida, Inc. and the Applicant are corporate affiliates by virtue of common ownership by Alltel Corporation.

⁴¹ FCC Public Notice, *Dismissal of Epic Touch Co.’s Petition for Redefinition of Service Area of Pioneer Telephone Association, Inc.* DA 05-2431, CC Docket No. 96-45 (rel. Sept. 8, 2005). In this *Public Notice*, the Commission dismissed as moot Epic Touch Co.’s petition with the Commission for redefinition of Pioneer Telephone Association, Inc.’s service area since redefinition of this service area already had been granted as a result of another carrier’s petition. As such, the *Public Notice* indicates that once redefinition is granted of a service area to one carrier, no further redefinition approval is required from a different carrier for that service area.

⁴² 47 C.F.R. § 54.207(b)-(c).

area level of a rural telephone company, the Commission shall also conduct a creamskimming analysis that compares the population density of each wire center in which the [ETC] applicant seeks designation against that of the wire centers in the study area in which the [ETC] applicant does not seek designation.”⁴³ This requirement is consistent with the first prong of the analysis laid out by the Joint Board, as required by Section 54.207(b). As discussed below, Alltel’s request meets the requirements of Sections 54.202(c) and 54.207.

In the *Recommended Decision* that laid the foundation for the Commission’s *First Report and Order*,⁴⁴ the Federal-State Joint Board enumerated three factors to be considered when redefining a rural service area. The first factor, as noted above, is whether the competitive carrier is attempting to “creamskim” by only proposing to serve the lowest cost exchanges.⁴⁵ As a wireless carrier, Alltel is restricted to providing service in those areas where it is licensed by the Commission. Alltel intends to exclude certain wire centers only because they fall outside of Alltel’s licensed area. Exhibits G-1 and G-2 clearly illustrate the fact that Alltel is seeking to exclude only wire centers that fall outside of its licensed area. It is clear there is no deliberate effort by Alltel to creamskim by picking and choosing the lowest cost exchanges. Alltel’s requested ETC area is based solely upon its licensed service area.

In *Virginia Cellular*, the FCC elaborated on its creamskimming analysis by relying on population density data that was submitted to demonstrate a lack of creamskimming effects.⁴⁶

⁴³ 47 C.F.R. § 54.202(c). The rule prescribes the creamskimming analysis as part of the public interest analysis. To avoid repetition, the discussion of creamskimming is contained solely in this redefinition section. *See also infra* section V.C. (cross-referencing the instant discussion).

⁴⁴ *Federal-State Joint Board on Universal Service*, Recommended Decision, 12 FCC Rcd 87 (1996) (“*Joint Board Recommended Decision*”).

⁴⁵ *Id.* at 179-80.

⁴⁶ *Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia*, Memorandum Opinion and Order, 19 FCC Rcd 1563, 1578-80 (2004) (“*Virginia Cellular*”).

This population density analysis has since been codified in Section 54.202(c). The population density data set forth in Exhibit H demonstrates that redefinition of the Florida ILEC service areas will not result in creamskimming effects. As demonstrated in Exhibit H, the population density data establishes that the average population density of the Sprint Florida, Inc. wire centers “served” by Alltel statewide is 170.73 persons per square mile which is only slightly higher than the average population density of the Sprint Florida, Inc. wire centers that are “not served,” which is 130.66 persons per square mile. This difference is not significant when compared with the magnitude of the differences found to raise creamskimming concerns in *Virginia Cellular* and *Highland Cellular*.⁴⁷ Moreover, the population density of the “served” areas in Alltel Florida Inc.’s study area (48.19 persons per square mile) is actually *lower* than the population density in the “unserved” areas (61.53 persons per square mile). Thus, redefinition of those study areas listed in Exhibit G on a wire center by wire center basis will not harm the Rural LECs’ ability to serve their entire study area or otherwise raise concerns of creamskimming effects.

Second, the Joint Board urged the Commission to consider the rural carrier’s special status under the Telecommunications Act of 1996.⁴⁸ Alltel submits that a Commission decision to designate Alltel as an ETC in the rural LEC areas in this proceeding will not affect or prejudice any future action the Commission may take with respect to the rural LECs’ special status as a rural telephone company, which is afforded pursuant to Section 251 of the Act. Further, because the Commission must weigh the relevant factors and consider the manner in which the public interest is affected prior to designating Alltel as an ETC pursuant to Section 214(e)(2), the

⁴⁷ See *id.* at 1579-80 (finding that it would not be in the public interest to designate Virginia Cellular in NTELOS’ study area because the population density in the served wire center would be approximately 273 persons per square mile, while the average population density of the remaining wire centers would be 33 persons per square).

⁴⁸ *Joint Board Recommended Decision*, 12 FCC Rcd at 180.

Commission's public interest evaluation would duly recognize the special status of the rural LECs.

Finally, the Federal-State Joint Board recommended that the FCC consider the administrative burden a rural LEC would face by calculating its costs on a basis other than its entire study area.⁴⁹ In the instant case, Alltel is proposing to redefine rural LEC service areas solely for ETC designation purposes. Redefining service areas for ETC purposes will in no way impact the way the affected rural LECs calculate their costs, but it is solely to determine the LEC area in which Alltel is to be designated as an ETC. Further, LECs may disaggregate their study areas to reallocate high-cost loop support payments pursuant to the FCC's *MAG Order*.⁵⁰ Accordingly, redefining rural LEC service areas as proposed herein will not impose any additional burdens on the rural LECs.⁵¹

V. Granting This Application Will Serve the Public Interest.

Prior to designating an eligible telecommunications carrier, the Commission must determine that such a designation is in the public interest.⁵² The Commission, in the *ETC Criteria Order*, codified a fact-specific public interest analysis it had developed in prior orders as the appropriate process for determining that an ETC designation is in the public interest. The Commission determined that, in the case of an applicant seeking designation in an area served by

⁴⁹ *Id.*

⁵⁰ *Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers; Federal-State Joint Board on Universal Service*, Second Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 00-256, Fifteenth Report and Order in CC Docket No. 96-45, and Report and Order in CC Docket Nos. 98-77 and 98-166, 16 FCC Rcd 19613 (2001).

⁵¹ In the event the Commission concludes that the population density disparity between the served and the unserved portions of any of these study areas is sufficiently great to present creamskimming concerns, Alltel proposes to withdraw certain dense wire centers from the proposed ETC Service Area in order to equalize the density between the served and the unserved areas.

⁵² 47 U.S.C. § 214(e)(6); 47 C.F.R. § 54.202(c).

a rural telephone company, it will consider the benefits of increased consumer choice, and the unique advantages and disadvantages of the applicant's service offering, as well as creamskimming issues when redefinition is requested. As demonstrated below, the Commission should find that designating Alltel as an ETC will serve the public interest.

A. Benefits of Increased Consumer Choice.

The FCC has recognized that designation of wireless ETCs promotes competition and benefits consumers in rural, high-cost areas by increasing consumer choice, availability of innovative services and deployment of new technologies. Designating Alltel as an ETC in these rural areas will bring to rural customers the benefits described above that are otherwise available mostly to urban customers. Availability of universal service funds will enable Alltel to improve service quality and coverage in areas that it currently serves, and expand its services into areas that would not be economically feasible to serve absent universal service funding.

Universal service funding will enable Alltel to continue to operate and maintain a higher number of cell sites in high-cost, low-density areas. Upon ETC designation, Alltel will offer qualifying customers a choice in their Lifeline/Link-Up provider. The mobility of wireless service will offer qualifying Lifeline/Link-Up customers an alternative means of communications that they do not currently enjoy. Further, improving and expanding the choices available to consumers will not only strengthen inter-modal wireless/wireline competition but also increase intra-modal wireless competition to the benefit of telecommunications customers throughout Florida. Finally, increased competition in the rural areas provides incentives to incumbent service providers to achieve new operating efficiencies and introduce additional choices, higher quality and better value to their customers.

B. Unique Advantages and Disadvantages of Alltel's Service Offering.

Designating Alltel as an ETC will also bring customers the unique advantages of mobility. The FCC recognized the unique advantages of mobility when it stated that:

[T]he mobility of telecommunications assists consumers in rural areas who often must drive significant distances to places of employment, stores, schools, and other critical community locations. In addition, the availability of a wireless universal service offering provides access to emergency services that can mitigate the unique risks of geographic isolation associated with living in rural communities.⁵³

Further, because Alltel's local calling areas are significantly larger than those of the incumbent LEC, Alltel's customers will be subject to fewer toll charges and be able to communicate across greater distances more frequently. Alltel will make available several offerings to its customers with varying amounts of local calling and different local calling areas, allowing customers to choose a universal service offering that best suits their particular calling needs.

The Commission has acknowledged that the disadvantages of wireless service may include dropped calls and poor coverage.⁵⁴ However, the FCC found that Virginia Cellular's assurances to build new towers to improve coverage, its commitments to comply with the CTIA Code for Wireless Service and annually report the number of complaints per thousand handsets, adequately addressed any concerns about the quality of Virginia Cellular's service.⁵⁵ Alltel understands that its business is built on customer satisfaction as evidenced by its recent initiative to voluntarily credit customers' accounts for dropped calls. Further, Alltel is a signatory to the CTIA Consumer Code for its entire operations, not only its ETC designated areas.

⁵³ *Virginia Cellular*, 19 FCC Rcd at 1576.

⁵⁴ *Id.* at 1576-77

⁵⁵ *Id.*

In addition, Alltel commits to maintain and construct cell sites in order to improve coverage, service quality and capacity. Attached as Exhibit D is Alltel's five-year plan demonstrating how high-cost universal service support will be used to improve its network. Finally, as described in Section II.C.1 of this Application, Alltel has committed to respond to reasonable requests for service from potential customers that are within its ETC Service Area, as required by Section 54.202(a)(1)(A) of the Commission's rules. In instances where a request for service is received from a potential customer within the ETC area but outside Alltel's existing network coverage, Alltel has committed to take the steps required by the rules to respond to such a request. Alltel's commitments to a network improvement plan and to respond to reasonable requests for service within the designated area mitigate any concerns that may exist regarding Alltel's network quality. Thus, grant of this petition will serve the public interest.

C. Creamskimming.

As demonstrated in detail in Section IV of this Application and Exhibit H attached hereto, there is no evidence of intentional creamskimming by Alltel, or creamskimming effects, in the two study areas that Alltel serves partially. Therefore, designating Alltel as an ETC is in the public interest and the Commission should expeditiously proceed to grant this Petition.

VI. High-Cost Certification.

Under Sections 54.313 and 54.314 of the Commission's rules, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the FCC and the Universal Service Administration Corporation ("USAC") their compliance with Section 254(e) of the Act. As explained above, the FPSC does not exercise jurisdiction over CMRS carriers such as Alltel. Therefore, in accordance with Sections 54.313(b) and 54.314(b) of the FCC's rules, Alltel commits to use available federal high-cost support for its intended purposes – the provision,

maintenance and upgrading of facilities serving the areas for which support is intended.⁵⁶ *See* Exhibit A.

Additionally, Alltel has submitted its high-cost certification with the FCC and USAC. A copy of this certification is attached hereto as Exhibit I. Alltel respectfully requests that the Commission issue a finding that Alltel has met the high-cost certification requirement and that Alltel is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.⁵⁷

VII. Anti-Drug Abuse Certification.

Alltel certifies that no party to this petition is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862. *See also* Exhibit A.

⁵⁶ 47 U.S.C. § 254(e); 47 C.F.R. §§ 54.313, 54.314.

⁵⁷ *See* 47 C.F.R. § 54.307(d); *see also* *Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314 of the Commission's Rules and Regulations*, Order, 18 FCC Rcd 7138 (2003).

VIII. Conclusion.

Alltel respectfully request the Commission to designate it as an ETC on an expedited basis.

Respectfully submitted,

Alltel Communications, Inc.

By: 

Glenn S. Rabin
Vice President
Federal Communications Counsel
Alltel Corporation
601 Pennsylvania Avenue, N.W.
Suite 720
Washington, D.C. 20004
(202) 783-3970

Date: October **13**, 2005

EXHIBIT A
DECLARATION

AFFIDAVIT

I, Glenn S. Rabin, do hereby declare under penalty of perjury as follows:

1. I am the authorized representative of Alltel Communications, Inc. ("Alltel" or the "Company") in charge of Alltel's Petition for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Florida. This affidavit is submitted in support of that Petition.
2. Alltel is authorized to provide cellular radiotelephone service in the State of Florida and is authorized to provide service in the requested ETC area described in its Application.
3. Alltel meets the criteria for ETC designation as explained herein.
4. Alltel is a "common carrier" for purposes of obtaining ETC designation pursuant to 47 U.S.C. § 214(e)(1). A "common carrier" is generally defined in 47 U.S.C. § 153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)(7) of the Commission's Rules provides that cellular service is a common carrier service. *See* 47 C.F.R. § 20.9(a)(7).
5. Alltel currently offers and is able to provide the services and functionalities identified in 47 C.F.R. § 54.101(a). Each of these services and functionalities is discussed more fully below.
 - a. Voice-grade access to the public switched telephone network. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a bandwidth of approximately 2700 Hertz frequency range. *See Federal-State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997) ("*Universal Service Order*"). Alltel meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with local telephone companies, all customers of Alltel are able to make and receive calls on the public switched telephone network within the specified bandwidth.
 - b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. Although the FCC had previously deferred a determination on the amount of local usage carriers would be required to provide as part of its universal service offering, it recently declined to adopt a specific local usage threshold. *See Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, 6385 (2005). The FCC concluded that a competitive ETC should offer a local usage plan comparable to the one offered by the incumbent Local Exchange Carrier (LEC) in the service areas for which it seeks ETC designation. Alltel will meet such a requirement by offering rate plans that include a predetermined level of local usage within a substantially larger local calling area than the incumbent LEC. Alltel meets the FCC's local usage requirement by offering customers (a) local

usage plans which include a predetermined level of local usage; and (b) a universal service offering that provides a comparable value to the one offered by the incumbent LEC.

- c. Dual-tone, multi-frequency (“DTMF”) signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. § 54.101(a)(3). Alltel currently uses out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling. Alltel therefore meets the requirement to provide DTMF signaling or its functional equivalent.
- d. Single-party service or its functional equivalent. “Single-party service” means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. *Universal Service Order* at 8810. The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user’s particular transmission. *Universal Service Order* at 8810. Alltel meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.
- e. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Phase I E-911, which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information. Alltel currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of the basic 911 requirement, and either provides, or will provide subscribers with Phase I and Phase II E-911 services in accordance with the deployment schedules agreed to by Alltel and the local emergency service provider.
- f. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. *Universal Service Order* at 8817-18. Alltel meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g., LECs, IXC, etc.).
- g. Access to interexchange services. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. “The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms.” *Universal Service Order* at 8819. Alltel presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with IXCs.

- h. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. *Universal Service Order* at 8821. Alltel meets this requirement by providing all of its customers with access to directory assistance by dialing “411” or “XXX-555-1212”.
 - i. Toll limitation for qualifying low-income consumers. An ETC must offer either “toll control” or “toll blocking” services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. § 54.101(a)(9). *See Universal Service Fourth Order on Reconsideration*, 13 FCC Rcd 5318 (1997). In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls. *Universal Service Order* at 8821-22. Alltel currently has no Lifeline customers because only carriers designated as an ETC can participate in Lifeline. *See* 47 C.F.R. §§ 54.400-415. Once designated as an ETC, Alltel will participate in Lifeline as required, and will provide toll blocking capability in satisfaction of the FCC’s requirement. Alltel currently has the technology to provide toll blocking and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offerings.
6. ANTI-DRUG ABUSE CERTIFICATION. To the best of my knowledge, no party to the Application, nor any of their officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) as specified in 1.2002(b) of the Commission’s rules, are subject to a denial of federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse of 1988, 21 V.S.C. § 862.

7. I declare under penalty of perjury that the foregoing is true and correct. Executed on October **13**, 2005.

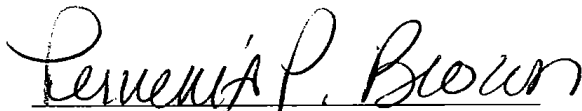
Alltel Communications, Inc.



Glenn S. Rabin
Vice President
Federal Communications Counsel
Authorized Representative

Alltel Corporation
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Suite 720
Washington, D.C. 20004
(202) 783-3970

Subscribed and sworn to before me
This **13th** day of October, 2005.


Notary Public

PERVENA BROWN
Notary Public of District of Columbia
My Commission Expires July 14, 2006

EXHIBIT B

**STATEMENT FROM
FLORIDA PUBLIC SERVICE COMMISSION
THAT IT LACKS JURISDICTION OVER
CMRS APPLICATIONS**

FLORIDA PUBLIC SERVICE COMMISSION

3

VOTE SHEET

AUGUST 19, 2003

RE: Docket No. 030346-TP - Petition for declaratory statement that NPCR, Inc. d/b/a Nextel Partners, commercial mobile radio service provider in Florida, is not subject to jurisdiction of Florida Public Service Commission for purposes of designation as "eligible telecommunications carrier."

Docket No. 030413-TP - Petition for declaratory statement that ALLTEL Communications, Inc., commercial mobile radio service provider in Florida, is not subject to jurisdiction of Florida Public Service Commission for purposes of designation as "eligible telecommunications carrier." (Deferred from July 15, 2003 conference.)

ISSUE 1: Should the Commission issue a declaratory statement?

RECOMMENDATION: Yes. The petitions satisfy the threshold requirements for a declaratory statement.

APPROVED

Commissioners Jaker and Baez dissented.

COMMISSIONERS ASSIGNED: Full Commission

COMMISSIONERS' SIGNATURES

MAJORITY

Charles M. Davis
James J. Baez
Rudy Bradley

DISSENTING

Maubry Smith
Harold J. Baez

REMARKS/DISSENTING COMMENTS:

DOCUMENT NUMBER-DATE

07656 AUG 19 '03

VOTE SHEET

AUGUST 19, 2003

Docket No. 030346-TP - Petition for declaratory statement that NPCR, Inc. d/b/a Nextel Partners, commercial mobile radio service provider in Florida, is not subject to jurisdiction of Florida Public Service Commission for purposes of designation as "eligible telecommunications carrier."

Docket No. 030413-TP - Petition for declaratory statement that ALLTEL Communications, Inc., commercial mobile radio service provider in Florida, is not subject to jurisdiction of Florida Public Service Commission for purposes of designation as "eligible telecommunications carrier." (Deferred from July 15, 2003 conference.)

(Continued from previous page)

ISSUE 2: Should the Commission issue a declaratory statement that Nextel and ALLTEL are not subject to the jurisdiction of the Commission for purposes of determining eligibility for Eligible Telecommunications Carrier ("ETC") status pursuant to 47 U.S.C. § 214(e)?

PRIMARY RECOMMENDATION: Yes.

APPROVED

Commissioners Faber and Baez dissented.

ALTERNATIVE RECOMMENDATION: No. The Commission should issue a declaratory statement that it has the authority to determine the eligibility of Nextel and ALLTEL for Eligible Telecommunications Carrier ("ETC") status pursuant to 47 U.S.C. s. 214(e).

ISSUE 3: Should these dockets be closed?

RECOMMENDATION: Yes. If the Commission votes to dispose of the petitions for declaratory statement, these dockets should be closed.

APPROVED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for declaratory statement that NPCR, Inc. d/b/a Nextel Partners, commercial mobile radio service provider in Florida, is not subject to jurisdiction of Florida Public Service Commission for purposes of designation as "eligible telecommunications carrier."

DOCKET NO. 030346-TP

In re: Petition for declaratory statement that ALLTEL Communications, Inc., commercial mobile radio service provider in Florida, is not subject to jurisdiction of Florida Public Service Commission for purposes of designation as "eligible telecommunications carrier."

DOCKET NO. 030413-TP
ORDER NO. PSC-03-1063-DS-TP
ISSUED: September 23, 2003

The following Commissioners participated in the disposition of this matter:

LILA A. JABER, Chairman
J. TERRY DEASON
BRAULIO L. BAEZ
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON

DECLARATORY STATEMENT

BY THE COMMISSION:

I. INTRODUCTION

A. The Parties

By petitions filed April 16, 2003, and April 29, 2003, respectively, NPCR, Inc., d/b/a Nextel Partners (Nextel), and ALLTEL Wireless Holdings, L.L.C. and New York NEWCO Subsidiary, Inc., subsidiaries of ALLTEL Communications, Inc. (ALLTEL), both of which are commercial mobile radio service (CMRS) providers, requested declaratory statements pursuant to Section 120.565, Florida Statutes, and Rule 28-105.002, Florida Administrative Code, that the Florida Public Service Commission (Commission) lacks jurisdiction to designate CMRS carriers eligible

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telecommunications carrier (ETC) status for the purpose of receiving federal universal service support.¹

Northeast Florida Telephone Company (Northeast Florida) and GTC, Inc. d/b/a GT COM (GT Com) filed petitions to intervene in these dockets on May 22, 2003. TDS TELECOM/Quincy Telephone (Quincy) filed a petition to intervene on May 29, 2003. ALLTEL filed a response but did not oppose the intervention. The petitions were granted by Order Nos. PSC-03-0712-PCO-TP and PSC-03-0713-PCO-TP, respectively, on June 16, 2003.

B. Summary of Ruling

After careful consideration and as discussed, *infra*, the Commission grants Nextel's and ALLTEL's petitions for declaratory statements.

ETC status is a prerequisite for a carrier to be eligible to receive universal service funding. The Federal Communications Commission (FCC) has determined that CMRS carriers, such as Nextel and ALLTEL, may be designated as ETCs. Section 214(e)(6) of the federal 1996 Telecommunications Act (1996 Act) provides that where a carrier is not subject to the jurisdiction of a state commission, then the FCC shall make the ETC determination. The FCC has ruled that, in order for it to consider requests for ETC status, the requesting carrier must provide an "affirmative statement" from the state commission or a court of competent jurisdiction that the state commission lacks the jurisdiction to make the designation.² See *Federal-State Joint Board on Universal Service: Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, CC Docket No. 96-45, FCC 00-208 (released June 30, 2000) at ¶ 93.³

¹ Notice of receipt of Nextel's Petition for Declaratory Statement was published in the May 2, 2003, issue of the Florida Administrative Weekly. Notice of receipt of ALLTEL's Petition was published in the May 16, 2003, issue. The petitioners agreed to toll the statutory time for disposition in order for us to consider their petitions at our August 19, 2003, agenda conference.

² We note that numerous state commissions have held that they do not have jurisdiction to designate CMRS carriers ETC status.

³ See also FCC 01-283, *Federal-State Joint Board on Universal Service; Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier for the Pine Ridge Reservation in South Dakota*, CC Docket No. 96-45, 16 FCC Rcd 18133; 2001 FCC LEXIS 5313, fn. 46 (released October 5, 2001); FCC 97-419, *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to § 214(e)(6) of the Telecommunications Act* (released December 29, 1997).

As discussed, *infra*, this Commission does not have jurisdiction over CMRS carriers for purposes of determining eligibility for ETC status. Indeed, the Florida Legislature has expressly excluded CMRS providers from the jurisdiction of the Commission. As the Commission lacks jurisdiction over CMRS providers, the FCC is the appropriate venue for Nextel and ALLTEL to seek ETC status.

II. THE COMMISSION LACKS JURISDICTION OVER CMRS PROVIDERS

A. Lack of Jurisdiction Over CMRS Providers

As a legislatively created body, the jurisdiction of the Commission is that conferred by statute – but no more than that. Chapter 364, Florida Statutes, governs our resolution of this threshold, and dispositive, jurisdictional issue. For present purposes, Chapter 364 expressly limits our jurisdiction to jurisdiction over “telecommunications companies” as set forth in that chapter.⁴ A telecommunications company does not include a CMRS provider. Indeed, the Legislature specifically provided to the contrary in Section 364.02(12), Florida Statutes, which expressly states that:

The term “telecommunications company” *does not include*:

...
(c) A commercial mobile radio service provider;

§ 364.02(12)(c), Fla. Stat. (emphasis added).⁵

The Commission has previously recognized, correctly so, that it lacks jurisdiction over CMRS providers. Specifically, in *In re: Application for certificate to provide pay telephone service by Radio Communications Corporation, and request for waiver of Rule 25-24.515(6), (10), and (14), F.A.C.*, the Commission noted that, pursuant to Section 364.02(12)(c), Florida Statutes, CMRS providers are “not regulated by this Commission” and that CMRS providers are “not subject to

⁴ Section 364.01, Florida Statutes, titled “Powers of commission, legislative intent,” states that “(1) The Florida Public Service Commission shall exercise over and in relation to telecommunications companies the powers conferred by this chapter.”

⁵ The one exception, not applicable here, is that CMRS providers along with intrastate interexchange telecommunications companies (also not regulated by the Commission) shall continue to be liable for any taxes imposed by the State pursuant to Chapters 202, 203, and 212, Florida Statutes, and any fees assessed pursuant to Chapter 364, Florida Statutes. See § 364.02(12), Fla.Stat.

Commission rules.” See Order No. PSC-00-1243-PAA-TC, Docket No. 991821-TC (July 10, 2000).⁶

B. The Arguments of the Intervenors

Intervenor’s reliance on the Commission’s Order in *In re: Establishment of Eligible Telecommunications Carriers Pursuant to Section 214(e) of the Telecommunications Act of 1996* is misplaced. See Commission Order No. PSC-97-1262-FOF-TP, issued October 14, 1997, in Docket No. 970644-TP. That order states, in pertinent part:

We believe that the requirements of the 1996 Act can be met initially by designating the incumbent LECs as ETCs. Upon consideration, we hereby designate the incumbent LECs (ILECs) as ETCs. LECs should continue to serve their current certificated service areas. All other carriers (non-ILECs) who wish to receive ETC status in the service area of a non-rural LEC should file a petition with the Commission for ETC status . . .

Id. at 4. In that order, the Commission also opined that “mobile carriers may serve those areas [where ALECs were prohibited from offering basic local telecommunications services within the territory served by a small LEC before January 1, 2001, unless the small LEC has elected price regulation], and may apply for ETC status.” *Id.* at 4.

⁶ Numerous state commissions have likewise held that they lack jurisdiction to designate ETC status for CMRS carriers. See, e.g., *In the Matter of Designation of Carriers Eligible for Universal Carrier Support*, Docket No. P-100, SUB 133c, 2003 WL 21638308, 2003 N.C. PUC LEXIS 686 (N.C.U.C., June 24, 2003) (“...the Commission ...lacks jurisdiction to designate ETC status for CMRS carriers.... [North Carolina statute] G.S. 62-3(23)), enacted on July 29, 1995, has removed cellular services, radio common carriers, personal communications services, and other services then or in the future constituting a mobile radio communications service from the Commission’s jurisdiction”); *In re Telecommunications Act of 1996*, 2002 WL 1277821, 2002 Va. PUC LEXIS 315, (Va. S.C.C., April 9, 2002) (“The Commission finds that § 214(e) (6) of the Act is applicable to Virginia Cellular’s Application as this Commission has not asserted jurisdiction over CMRS carriers and that the Applicant should apply to the FCC for ETC designation”); *In re Pine Belt Cellular, Inc.*, Docket U-4400, Alabama Public Service Commission, 2002 WL 1271460, 2002 Ala. PUC LEXIS 196 (March 12, 2002) (“it seems rather clear that the Commission has no jurisdiction to take action on the Application of the Pine Belt companies for ETC status in this jurisdiction. The Pine Belt companies and all other wireless providers seeking ETC status should pursue their ETC designation request with the FCC as provided by 47 USC § 214(e)(6)”).

Reliance on this statement to conclude that this Commission has jurisdiction to designate CMRS carriers as having ETC status is misguided. Simply put, the Commission cannot by fiat simply declare its own jurisdiction where, as the Florida Legislature has made clear, no jurisdiction exists.⁷ See, e.g., *Gulf Coast Hospital, Inc. v. Dept. of Health and Rehabilitative Services*, 424 So. 2d 86, 91 (Fla. 1st DCA 1982) (noting that even if an agency's policy concerns might be valid, "[a]rguments concerning the potential effect of the legislation or questioning the wisdom of such legislation are matters which should be presented to the Legislature itself.").

Intervenors' public interest argument must likewise fail. Intervenors argue that Florida's public interest would not be served by having competitive carriers, including CMRS providers such as petitioners, designated as ETCs in rural areas. They continue that this Commission is best situated to make the public interest inquiry. This argument is fundamentally flawed. It is only if this Commission has jurisdiction over CMRS carriers in the first instance that the Commission could exercise that jurisdiction to perform the inquiry proposed by Intervenors.

C. Intervenors Run Afoul of Cape Coral and its Progeny

The arguments of the Intervenors run counter to the clear teachings of *Cape Coral* and its progeny. Florida law makes clear that the Commission does not have jurisdiction over CMRS carriers. Even if there was doubt about that proposition, which the Florida Legislature has made clear there is not, such doubt would have to be resolved against finding jurisdiction. As the Florida Supreme Court made clear in *City of Cape Coral v. GAC Utilities, Inc., of Florida*:

All administrative bodies created by the Legislature are not constitutional bodies, but, rather, simply mere creatures of statute. This, of course, includes the Public Service Commission.... As such, the Commission's powers, duties and authority are those and only those that are conferred expressly or impliedly by statute of the State.... Any reasonable doubt as to the lawful existence of a particular power that is being exercised by the Commission must be resolved against the exercise thereof,... and the further exercise of the power should be arrested.

281 So. 2d 493, 495-96 (Fla. 1973). See also *Lee County Elec. Co-op., Inc. v. Jacobs*, 820 So. 2d 297 (Fla. 2002) ("any reasonable doubt regarding its regulatory power compels the PSC to resolve

⁷ We also note that the issue of the Commission's jurisdiction to determine ETC status for CMRS providers was not raised, litigated, or relevant to the holding in Order No. PSC-97-1262-FOF-TP, which designated local exchange companies in Florida as ETCs. We also note that in the time since that holding, Congress, through the enactment of Section 214(e)(6) to the 1996 Act, expressly authorized the FCC to make ETC designations of CMRS providers when states like Alabama, Florida, North Carolina, Virginia, and others lack jurisdiction over such carriers.

that doubt against the exercise of jurisdiction"); *Dept. of Transp. v. Mayo*, 354 So. 2d 359 (Fla. 1977) ("any reasonable doubt as to the existence of a particular power of the Commission must be resolved against it"); *Schiffman v. Dept. of Professional Regulation, Board of Pharmacy*, 581 So. 2d 1375, 1379 (Fla. 1st DCA 1991) ("An administrative agency has only the authority that the legislature has conferred it by statute"); *Lewis Oil Co., Inc. v. Alachua County*, 496 So. 2d 184, 189 (Fla. 1st DCA 1986) ("Administrative agencies have only the powers delegated by statute").

The Commission has previously (and correctly) recognized the limited nature of its jurisdiction. See *In re: Complaint Against Florida Power & Light Company Regarding Placement of Power Poles and Transmission Lines*, Docket No. 010908-EI, Order No. PSC-02-0788-PAA-EI, Florida Public Service Commission, June 10, 2002; *In re: Complaint and Petition by Lee County Electric Cooperative, Inc. for an Investigation of the Rate Structure of Seminole Electric Cooperative, Inc.*, Docket No. 981827-EC, Order No. PSC-01-0217-FOF-EC, Florida Public Service Commission, January 23, 2001 (recognizing that any doubt as to the Commission's jurisdiction must be resolved against an exercise of jurisdiction).

The authority of this Commission is derived from state law as written by the Florida Legislature, and that authority is expressly limited as it pertains to CMRS providers. Regardless of the merits of the debate of state versus federal designation of ETC status for wireless providers, the Commission must remain cognizant of our role and not regulate beyond our specific mandate. Despite good intentions, we should avoid even the appearance that we are replacing the Legislature's judgment with our own.

Florida as a state certainly has an interest in universal service issues. That interest, however, does not create jurisdiction in this Commission to determine whether CMRS carriers should be granted ETC status (a status, we note, that is one of federal creation),⁸ especially where the Legislature has specifically provided that the Commission does not have jurisdiction over CMRS providers.⁹ As a creature of statute, this Commission is not free to operate according to its "own inscrutable wisdom, 'an administrative Frankenstein, once created, (acting) beyond the control of its Legislature creator.'" *Turner v. Wainwright*, 379 So. 2d 148 (Fla. 1st DCA 1980) (discussing the

⁸ We note that other states have an interest in universal service issues, notwithstanding that their utility commissions do not regulate CMRS providers. See, e.g., *N.C. Gen. Stat. A. § 62-110, § 105-164.4c and § 143B-437.40 (North Carolina)*; *Virginia's Universal Service Plan (Va. S.C.C. Case Nos. PUC970135 and PUC970063)* and *Va. Code Ann. § 56-468*.

⁹ Section 364.025, Florida Statutes, provides for alternative local exchange companies (now known as competitive local exchange companies by virtue of Chapter 2003-32, § 3, Laws of Fla., amending Section 364.02, Florida Statutes), which are "telecommunications companies" subject to Commission jurisdiction, to apply to the Commission for universal service provider and carrier of last resort status. Notably, no similar provision exists regarding CMRS providers.

Parole Commission). Indeed, “[a]rguments concerning the potential effect of the legislation or questioning the wisdom of such legislation are matters which should be presented to the Legislature itself.” *Gulf Coast Hospital, Inc. v. Dept. of Health and Rehabilitative Services*, 424 So. 2d 86, 91 (Fla. 1st DCA 1982).

D. Conclusion

Based on the foregoing, the Commission does not have jurisdiction over CMRS providers for purposes of determining eligibility for ETC status pursuant to 47 U.S.C. § 214(e).

III. A DECLARATORY JUDGMENT OF “NO JURISDICTION” IS PROPER

Section 120.565, Florida Statutes, governs the issuance of a declaratory statement. In pertinent part, that section provides:

- (1) Any substantially affected person may seek a declaratory statement regarding an agency’s opinion as to the applicability of a statutory provision, or of any rule or order of the agency, as it applies to the petitioner’s particular set of circumstances.
- (2) The petition seeking a declaratory statement shall state with particularity the petitioner’s set of circumstances and shall specify the statutory provision, rule, or order that the petitioner believes may apply to the set of circumstances.

Rule 28-105.001, Florida Administrative Code, further explains that: “a declaratory statement is a means for resolving a controversy or answering questions or doubts concerning the applicability of statutory provisions, rules, or orders over which the agency has authority.” The purpose of a declaratory statement by an administrative agency is to allow a petitioner to select a proper course of action in advance. *Novick v. Dept. of Health, Bd. of Medicine*, 816 So. 2d 1237 (Fla. 5th DCA 2002).

Petitioners have satisfied the requirements for the issuance of a declaratory statement by the Commission. At issue is the applicability of Chapter 364, Florida Statutes, which excludes CMRS providers from Commission jurisdiction. As CMRS providers seeking ETC status, which status is a prerequisite to being eligible to receive federal universal service funds, petitioners are “substantially affected persons” within the meaning of Section 120.565, Florida Statutes. Petitioners have stated with particularity their circumstances and have identified the statutory provision that applies to their circumstances.

Intervenors urge us to deny the petitions for declaratory statement. Intervenors first assert that to receive ETC status in the service area of a rural ILEC, a non-ILEC must file a petition proposing an appropriate service area and demonstrating that designation as an ETC is in the public interest, a determination that they assert can properly be made only after a formal administrative

hearing and not in a declaratory statement proceeding. They next assert that the petitions require a response that amounts to a rule stating that CMRS providers are not subject to the jurisdiction of the Commission for purposes of designation as an ETC. Finally, Intervenor asserts that the petitions fail to allege an uncertainty about a Commission statute, rule, or order and thus, fail to meet the pleading requirements of Rule 28-105.001, Florida Administrative Code.

Intervenor's arguments fail. Regarding their first assertion, where the Commission lacks jurisdiction, as it does here, it would be illogical for a party to seek to have the Commission exercise jurisdiction to do something it does not have the power to do. To exercise jurisdiction, the Commission would have to determine that the petitioners are telecommunications companies, a determination that is expressly precluded by the statute. As the Commission does not have jurisdiction to make the ETC designation for CMRS providers, it is not necessary for Nextel or ALLTEL to file an application that addresses the eligibility requirements to be designated an ETC.

We also disagree that we should deny the petitions for declaratory statement because the statement requested would amount to a rule. On numerous occasions, the Commission has resolved controversies about the scope of our jurisdiction in declaratory statement proceedings. *See In re: Petition of St. Johns Service Company for declaratory statement on applicability and effect of 367.171(7), Florida Statutes*, Order No. PSC-99-2034-DS-WS, issued October 18, 1999, in Docket No. 982002-WS; *In re: Petition of PW Ventures, Inc., for declaratory statement in Palm Beach County*, Order No. 18302, issued October 16, 1987, in Docket No. 870446-EU, *aff'd on other grounds, PW Ventures, Inc. v. Nichols*, 533 So. 2d 281 (Fla. 1988).

Intervenor confuses the notion of a rule with the issue of jurisdiction. Commission jurisdiction over a matter either exists or it does not. It cannot be created or denied by a rule. Indeed, the Commission could only issue a rule where it has jurisdiction over the subject matter of the rule. Further, determining whether the Legislature has vested the Commission with jurisdiction is typically a one-time determination, whereas rulemaking is more appropriate for such matters as recurring issues, implementation of statutes, and codification of policy.

Finally, we dismiss the assertion that the petitions should be denied for failing to allege an uncertainty about a Commission statute, rule, or order. The petitions seek a statement that our statutes, rules, and orders are not applicable to ALLTEL or Nextel as CMRS providers, for the purposes of determining whether they are eligible to receive federal universal service funding. As set forth herein, we agree. And on the facts presented, this determination is properly made in a declaratory statement proceeding. We therefore conclude that the petitions satisfy the requirements for a declaratory statement.

Based on the foregoing, we grant the petitions and declare that Nextel and ALLTEL, as commercial mobile radio service providers, are not subject to the jurisdiction of the Florida Public Service Commission for purposes of designation as an eligible telecommunications carrier under 47 U.S.C. § 214(e).

Now, therefore, it is

ORDERED by the Florida Public Service Commission that the Petitions for a Declaratory Statement filed by Nextel & ALLTEL are granted. It is further

ORDERED that the substance of the Declaratory Statement is as set forth in the body of this Order. It is further

ORDERED that this docket should be closed.

By ORDER of the Florida Public Service Commission this 23rd Day of September, 2003.

BLANCA S. BAYÓ, Director
Division of the Commission Clerk
and Administrative Services

By: Kay Flynn
Kay Flynn, Chief
Bureau of Records and Hearing
Services

(S E A L)

CTM

Commissioner Baez dissents. Chairman Jaber dissents from the majority's decision with the following opinion:

Rule 28-105.001, Florida Administrative Code, states in part: "A declaratory statement is not the appropriate means for determining the conduct of another person or for obtaining a policy statement of general applicability from an agency." The circumstances brought before us in these two cases are not limited to the two wireless providers that have filed petitions for declaratory statement. Rather, our decision will impact not only all of the wireless carriers and other telecommunications service providers in Florida, but, more importantly, will impact the state's overall universal service policy. This is a case of first impression, and will result in a policy of general applicability. I do not believe a declaratory statement is the appropriate mechanism for

deciding this very important issue. I would rather establish an expedited proceeding that allows us to hear from other providers in the form of testimony, if appropriate, or legal briefs on federal and state law regarding ETC status and the impact of such on Florida's stance on universal service. In making a decision regarding the jurisdictional issues in this matter, it is critical to fully understand the ramifications of our decision on the size and applicability of the federal universal service fund to Florida's ratepayers. The declaratory statement process does not allow an opportunity for that critical review. Without input from all affected parties on the legal and policy implications of this decision, I am uncomfortable with the conclusion that we do not have jurisdiction in this matter. For these reasons alone, I dissent.

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by the Commission's final action in this matter may request: 1) reconsideration of the decision by filing a motion for reconsideration with the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or 2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water and/or wastewater utility by filing a notice of appeal with the Director, Division of the Commission Clerk and Administrative Services and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

EXHIBIT C

**DESCRIPTION OF ALLTEL'S
CURRENT RATE PLANS IN THE STATE OF FLORIDA**

Total Freedom®

Select a Plan

COMPARE PLANS

PRINT

The Total Freedom wireless plan from Alltel features our largest coverage area and eliminates long-distance and roaming fees in all 50 states. When you connect with Total Freedom, you're free to call from anywhere to anywhere across the entire U.S.



- Sign up today and receive**
- Our largest coverage area
 - Free nationwide long distance
 - Free nationwide roaming

- Plan features include**
- Basic Voice Mail
 - Caller ID
 - 3-Way Calling
 - No Answer Transfer
 - Call Forwarding
 - Call Waiting
 - Pay-Per-Use Messaging (8¢ Outgoing or Incoming)

Total Freedom Plans	\$39.99	\$49.99	\$59.99	\$79.99	\$99.99	\$149.99	\$199.99	\$299.99
Included Anytime Minutes	200	350	500	650	900	1500	2000	3000
Night and Weekend Home Minutes*	1000	1000	1000	1000	1000	1000	1000	1000
Mobile-to-Mobile Home Minutes**	1000	1000	1000	1000	1000	1000	1000	1000
Add'l Minute Rate	40¢	40¢	40¢	35¢	25¢	25¢	25¢	20¢

A \$20 non-refundable activation fee will apply.

*Night minutes are Mon. — Thurs. 9 p.m. — 5:59 a.m. Weekend minutes are Fri. 9 p.m. — Mon 5:59 a.m. Night and Weekend minutes available in the Total Freedom coverage area. Minutes must be used each month and do not carry over.

**Mobile-to-Mobile minutes apply to calls made to and from Alltel wireless customers that originate and terminate within the Total Freedom coverage area. Call forwarding, 411 and Voice Mail calls excluded.

One-year and two-year service agreements available.

Please note: Some included features and add-ons may not be available in certain areas.

[Explanation of Fees & Services](#) | [Service Agreement](#)



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Call 1-866-Alltel7
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Available Add-ons

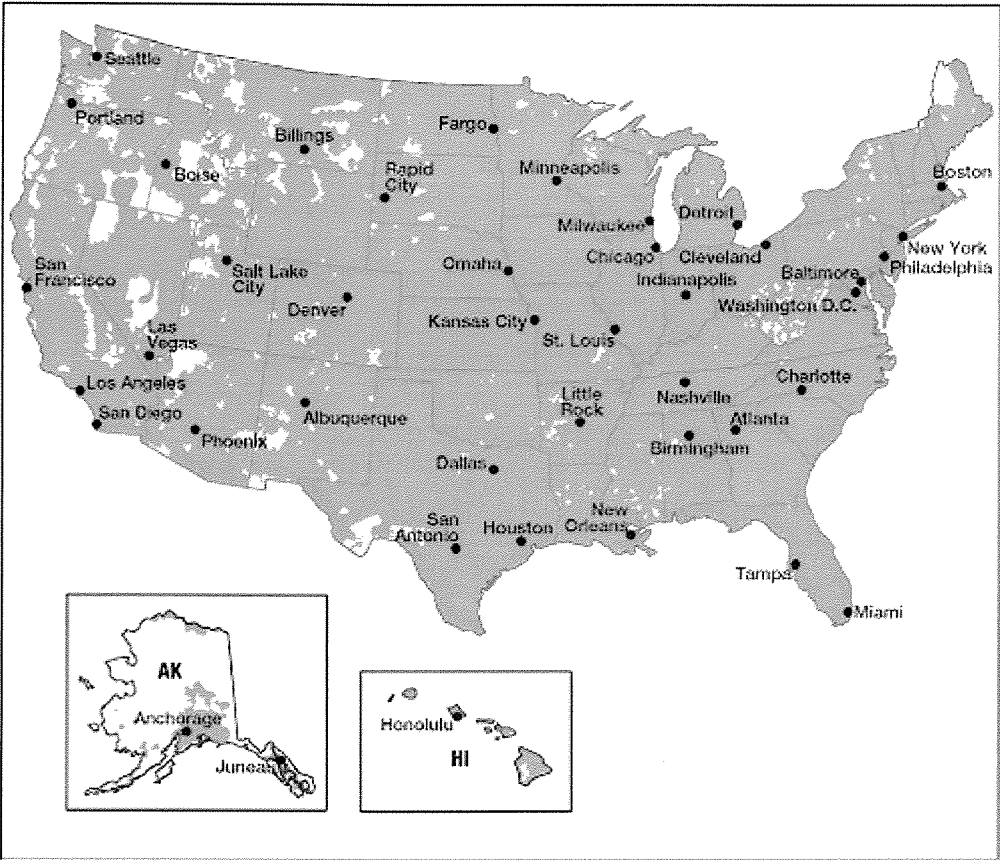
- Touch2TalkSM
\$5-15 per month
- Call Home Free
- Share Your Minutes
\$9.99 per month on select plans
- Enhanced Voice Mail
\$5 per month
- ProductGuardSM
\$4 per month
- Mr. Rescue[®]
\$3 per month
- Directory Plus
\$1.25 per call plus airtime
- Extended Night Minutes
\$7 per month

[> MORE](#)

Add Lines for \$9.99
Share your minutes on up to 4 lines!
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Stay in touch worldwide
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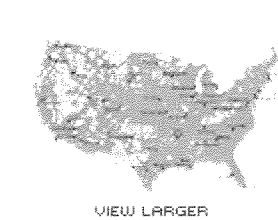
National Freedom®

Select a Plan

COMPARE PLANS

PRINT

National Freedom from Alltel offers extensive coverage at great rates. With this flexible plan, you're free to make calls to major U.S. cities and surrounding metropolitan areas in the Alltel national network — all without additional roaming or long-distance fees.



Sign up today and receive

- Extensive coverage including major U.S. cities
- Free nationwide long distance
- Free roaming near major cities

Plan features include

- Basic Voice Mail
- Caller ID
- 3-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting
- Pay-Per-Use Messaging (8¢ Outgoing or Incoming)

National Freedom Plans	\$39.99	\$49.99	\$79.99	\$99.99	\$149.99	\$199.99
Included Anytime Minutes	500	1000	1350	2000	3000	4000
Night and Weekend Minutes*	1000	unlimited	unlimited	unlimited	unlimited	unlimited
Mobile-to-Mobile Minutes**	1000	unlimited	unlimited	unlimited	unlimited	unlimited
Add'l Minute Rate	40¢	40¢	35¢	25¢	25¢	25¢

A \$20 non-refundable activation fee will apply. The Alltel National Freedom Network covers most U.S. cities. Coverage may not be available in all areas. National Freedom customers calling Puerto Rico coverage area may be subject to long-distance charges.

*Night minutes are Mon. - Thurs. 9 p.m. - 5:59 a.m. Weekend minutes are Fri. 9 p.m. - Mon 5:59 a.m. Minutes must be used each month and do not carry over.

**Mobile-to-Mobile minutes apply to calls made to and from Alltel wireless customers that originate and terminate within the National Freedom network coverage area. Call forwarding, 411 and Voice Mail calls excluded.

One-year and two-year service agreements available.

Please note: Some included features and add-ons may not be available in certain areas.

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Touch2TalkSM
\$5-15 per month

FreeToRoam[®] Minutes
\$10 per month


Call Home Free

Share Your Minutes
\$9.99 per month on select plans

Extended Night Minutes
\$7 per month

> MORE

Special terms and conditions apply.



Touch2TalkSM

Walkie-talkie service across the Alltel network.

> MORE

Get 2 Lines for \$75

Share 1000 nationwide minutes.

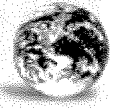
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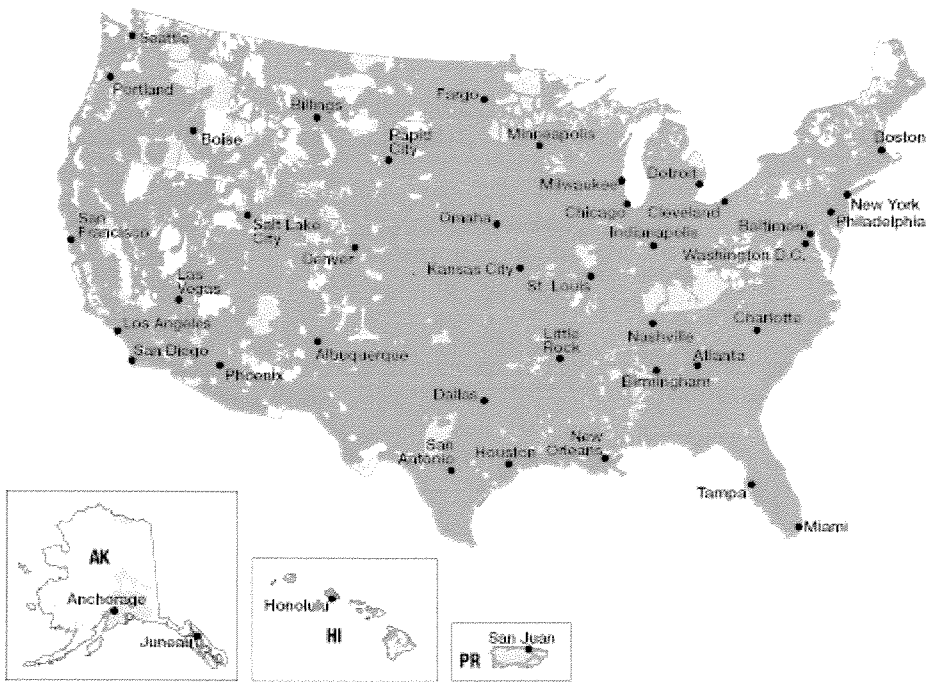


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Find a store near you

[VIEW YOUR COVERAGE](#)

Enter Zip Code > GO

Sign up today and receive

- Large local coverage area
- Best value for local callers
- Free nationwide long distance*

Plan* features include

- * Basic Voice Mail
- * Caller ID
- * 3-Way Calling
- * No Answer Transfer
- * Call Forwarding
- * Call Waiting
- * Pay-Per-Use Messaging (8¢ Outgoing or Incoming)

*Included on plans \$39.99 and higher.

Greater Freedom Plans	\$29.99	\$39.99	\$49.99	\$59.99	\$79.99	\$99.99	\$149.99	\$199.99
Included Anytime Minutes	300	1000	1000	1200	1600	2200	3200	4200
Night and Weekend Minutes**	—	—	unlimited	unlimited	unlimited	unlimited	unlimited	unlimited
Mobile-to-Mobile Minutes***	—	—	unlimited	unlimited	unlimited	unlimited	unlimited	unlimited
Add'l Minute Rate	45¢	40¢	40¢	40¢	35¢	25¢	25¢	25¢

Calls originating and terminating within the local coverage area use plan minutes and are toll free. On the \$29.99 plan, calls placed while in the local coverage area and terminating to anywhere outside the local coverage area will be charged 15¢ per minute long distance. Some areas may offer options for toll-free calling to the U.S. Customers utilizing one of these options may not pay long-distance charges, but will still continue to use rate plan minutes. Airtime charges may apply if rate plan minutes are unavailable. A \$20 non-refundable activation fee will apply.

Maps are general representation of coverage. Coverage varies based on system buildout, system availability and capacity, customer's equipment, terrain, signal strength, weather and other conditions.

****Night minutes are Mon. — Thurs. 9 p.m. — 5:59 a.m. Weekend minutes are Fri. 9 p.m. — Mon. 5:59 a.m. Minutes must be used each month and do not carry over.**

***Mobile-to-Mobile Minutes apply to calls between Alltel wireless customers that begin and end in your plan's calling area. Call forwarding, 411 and Voice Mail calls excluded.

One-year and two-year service agreements available.

Some included features and add-ons may not be available in certain areas.

Explanation of Fees & Services | Service Agreement

Available Add-ons*

Touch2TalkSM
\$5-15 per month

FreeToRoam® Minutes
\$10 per month

Call Home Free

Share Your Minutes
\$9.99 per month on sele

Extended Night Minutes
\$7 per month

Special terms and conditions apply.

Learn more about available options, including add-ons for under \$39.99. [>MORE](#)

Nationwide Long Distance



FREE – When you sign up today for \$49.99.

FreeToRoam[®]
Minutes

Get 100 nationwide minutes each month.

▶ MORE

Stay in touch worldwide

Call Internationally

4. MORE





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EXHIBIT D

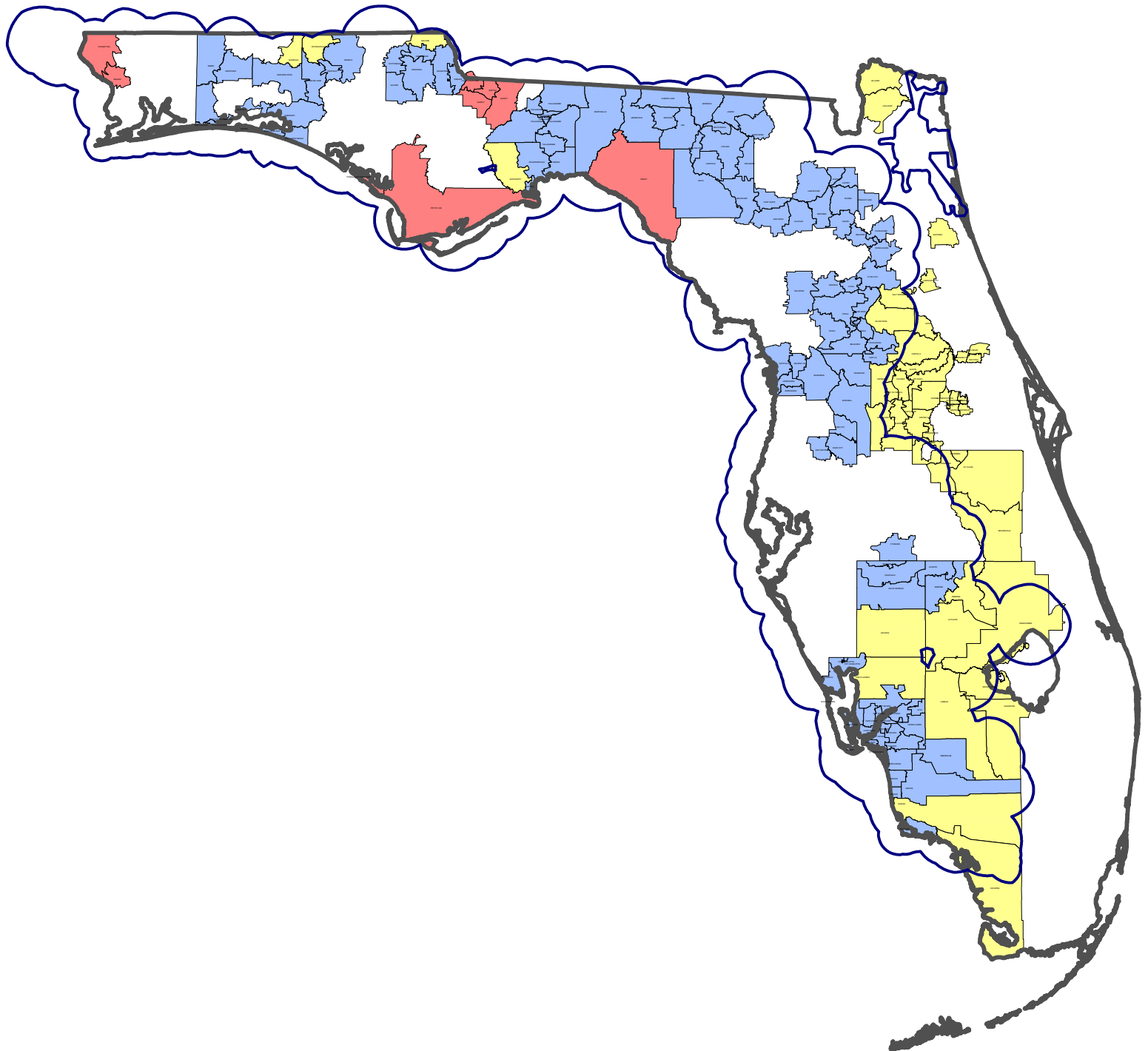
**ALLTEL'S
FIVE-YEAR SERVICE
IMPROVEMENT PLAN**

REDACTED

EXHIBIT E

MAP ILLUSTRATING ALLTEL'S LICENSED (RURAL) AREA

Alltel Communications, Inc. State of Florida



- Wire centers served by Alltel in partially served rural study areas
- Wire centers not served by Alltel in partially served rural study areas
- Wire centers in rural study areas served in their entirety

EXHIBIT F

**LIST OF WIRE CENTERS
WITHIN RURAL STUDY AREAS
THAT ARE SERVED BY ALLTEL IN THEIR ENTIRETY**

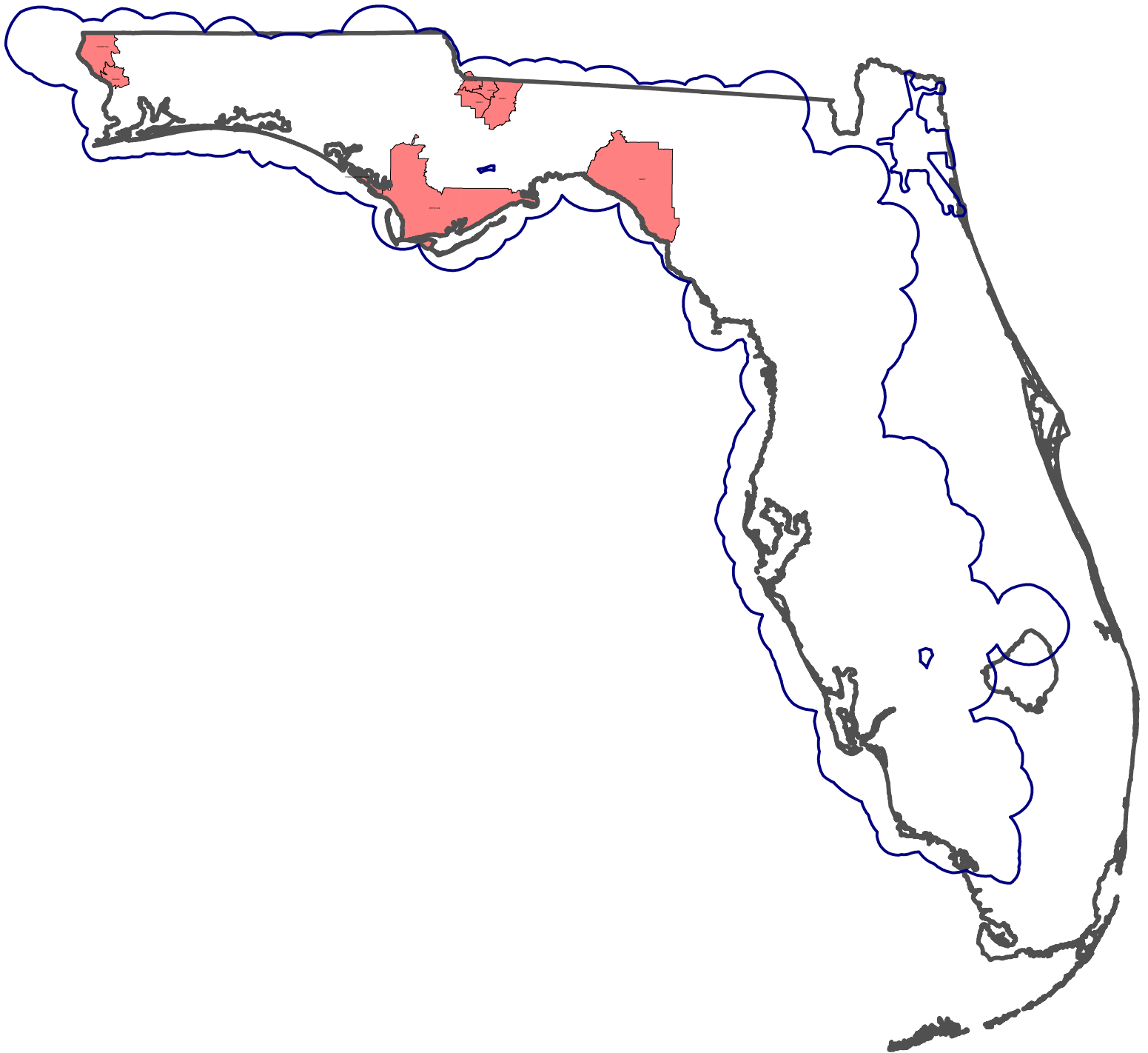
**ALLTEL COMMUNICATIONS, INC.
RURAL STUDY AREAS SERVED IN THEIR ENTIRETY**

LEC NAME	WIRE CENTER NAME	CLLI CODE
FRONTIER COMMUNICATIONS OF THE S	MOLINO	MOLNFLXA
FRONTIER COMMUNICATIONS OF THE S	WALNUT HILL	WLHLFLXA
GTC INC. - FL	CHATTAHOOCHEE	CHTHFLXA
GTC INC. - FL	PERRY	PRRYFLXA
GTC INC. - FL	PRT ST JOE	PTSJFLXA
GTC INC. - FL	TYNDALL AIR FORCE BASE	TAFBFLXA
QUINCY TELEPHONE CO.	QUINCY	GNBOFLXA
QUINCY TELEPHONE CO.	GRETNA	GRETFLXA
QUINCY TELEPHONE CO.	QUINCY	QNCYFLXA

EXHIBIT F-1

**MAP ILLUSTRATING WIRE CENTERS
WITHIN RURAL STUDY AREAS
THAT ARE SERVED BY ALLTEL IN THEIR ENTIRETY**

Alltel Communications, Inc.
State of Florida

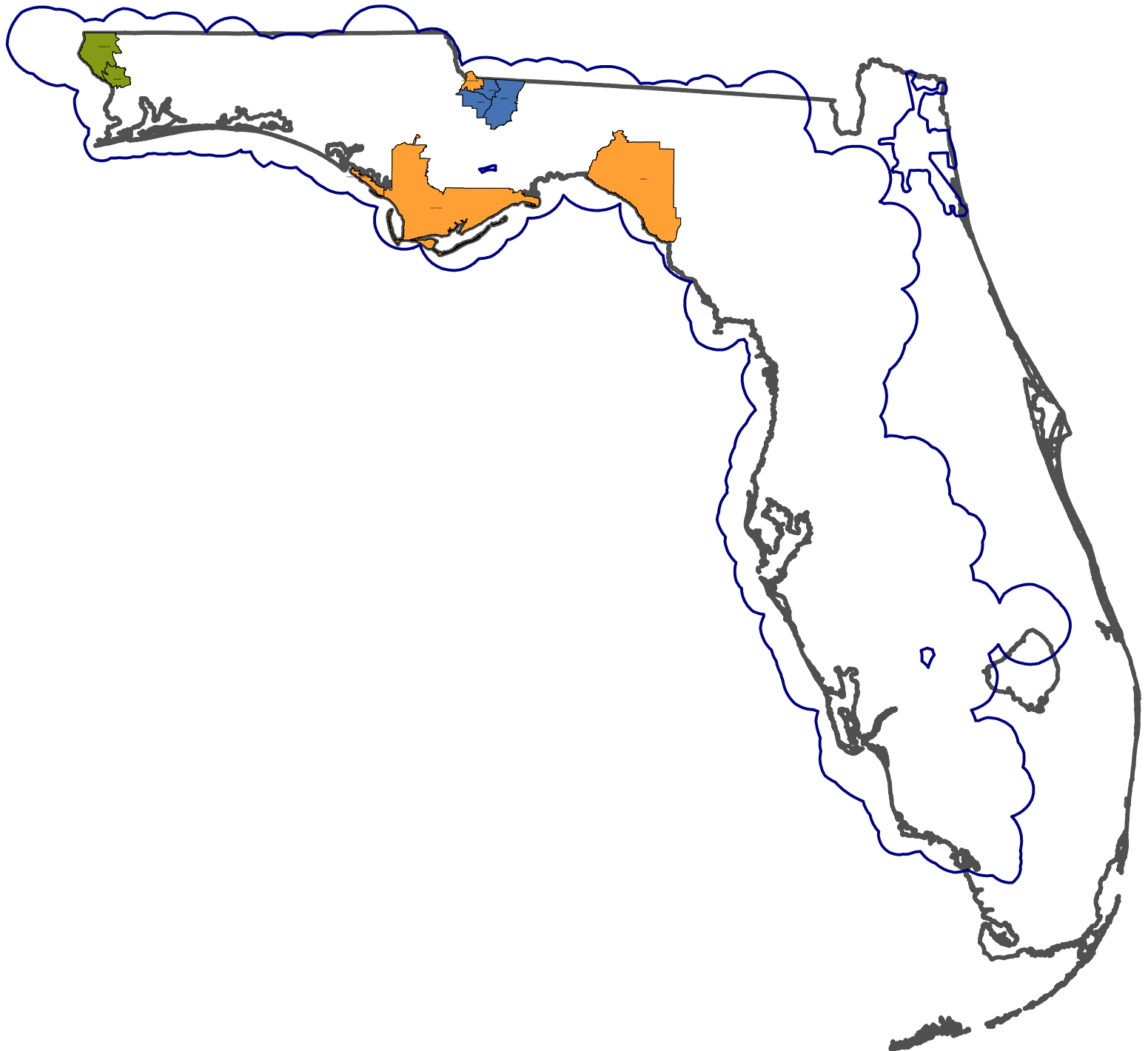


■ Wire centers in rural study areas served in their entirety

EXHIBIT F-2

**MAP ILLUSTRATING
INCUMBENT LEC STUDY AREAS
THAT ARE SERVED BY ALLTEL IN THEIR ENTIRETY**

Alltel Communications, Inc.
State of Florida



ILECs

- FRONTIER COMMUNICATIONS
- GTC INC. - FL
- QUINCY TELEPHONE CO.

EXHIBIT G

LIST OF WIRE CENTERS WITHIN RURAL STUDY AREAS THAT ARE NOT SERVED IN THEIR ENTIRETY

**ALLTEL COMMUNICATIONS, INC.
PARTIALLY SERVED RURAL STUDY AREAS**

LEC NAME	WIRE CENTER NAME	CLLI CODE	SERVED
ALLTEL FLORIDA INC.	CALLAHAN	CLHNFLXA	NO
ALLTEL FLORIDA INC.	CRESCENT CITY	CRCYFLXA	NO
ALLTEL FLORIDA INC.	HILLIARD	HLRDFLXA	NO
ALLTEL FLORIDA INC.	HASTINGS	HSNGFLXA	NO
ALLTEL FLORIDA INC.	ALACHUA	ALCHFLXA	YES
ALLTEL FLORIDA INC.	BOYS RANCH	BORAFLXA	YES
ALLTEL FLORIDA INC.	BRANFORD	BRFRFLXA	YES
ALLTEL FLORIDA INC.	BROOKER	BRKRFLXA	YES
ALLTEL FLORIDA INC.	CITRA	CITRFLXA	YES
ALLTEL FLORIDA INC.	DOWLING PARK	DWPKFLXA	YES
ALLTEL FLORIDA INC.	FLORAHOME	FLRHFLXA	YES
ALLTEL FLORIDA INC.	FORT WHITE	FTWHFLXA	YES
ALLTEL FLORIDA INC.	HIGH SPGS	HGSPFLXA	YES
ALLTEL FLORIDA INC.	INTERLACHEN	INTRFLXA	YES
ALLTEL FLORIDA INC.	JENNINGS	JNGSFLXA	YES
ALLTEL FLORIDA INC.	JASPER	JSPRFLXA	YES
ALLTEL FLORIDA INC.	LAKE BUTLER	LKBTFLXA	YES
ALLTEL FLORIDA INC.	LURAVILLE	LRVLFLXA	YES
ALLTEL FLORIDA INC.	LIVE OAK	LVOKFLXA	YES
ALLTEL FLORIDA INC.	MAYO	MAYOFLXA	YES
ALLTEL FLORIDA INC.	REDDICK	MCINFLXA	YES
ALLTEL FLORIDA INC.	MELROSE	MLRSFLXA	YES
ALLTEL FLORIDA INC.	FT MC COY	ORSPFLXA	YES
ALLTEL FLORIDA INC.	RAIFORD	RAFRFLXA	YES
ALLTEL FLORIDA INC.	WALDO	WALDFLXA	YES
ALLTEL FLORIDA INC.	WHITE SPGS	WHSPFLXA	YES
ALLTEL FLORIDA INC.	WELLBORN	WLBFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	GLENDALE	GLDLFLXA	NO
SPRINT-FLORIDA INC. DBA CENTRAL	MALONE	MALNFLXA	NO
SPRINT-FLORIDA INC. DBA CENTRAL	REYNOLDS HILL	RYHLFLXA	NO
SPRINT-FLORIDA INC. DBA CENTRAL	SOPCHOPPY	SPCPFLXA	NO
SPRINT-FLORIDA INC. DBA CENTRAL	ALFORD	ALFRFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	BAKER	BAKRFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	BONIFAY	BNFYFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	CRAWFORDVILLE	CFVLFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	CHERRY LAKE	CHLKFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	CRESTVIEW	CRVWFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	COTTONDALE	CTDLFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	DESTIN	DESTFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	DEFUNIAK SPGS	DFSPFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	EGLIN FIELD	ELFDLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	FREEPORT	FRPTFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	FT WALTON BCH	FTWBFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	FT WALTON BCH	FTWBFLXB	YES
SPRINT-FLORIDA INC. DBA CENTRAL	MARY ESTHER	FTWBFLXC	YES
SPRINT-FLORIDA INC. DBA CENTRAL	GRAND RDG	GDRGFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	GREENVILLE	GNVLFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	GREENWOOD	GNWDFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	HURLBURT FIELD	HRFDLXAJ	YES

**ALLTEL COMMUNICATIONS, INC.
PARTIALLY SERVED RURAL STUDY AREAS**

LEC NAME	WIRE CENTER NAME	CLLI CODE	SERVED
SPRINT-FLORIDA INC. DBA CENTRAL	HURLBURT FIELD	HRFDLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	KINGSLEY LAKE	KGLKFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	LEE	LEE FLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	LAWTEY	LWTFYFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	MADISON	MDSNFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	MONTICELLO	MNTIFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	MARIANNA	MRNNFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	PANACEA	PANCFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	PONCE DE LEON	PNLNFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	SANTA ROSA BEACH	SGBHFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	SHALIMAR	SHLMFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	SNEADS	SNDSFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	SANTA ROSA BCH	SNRSFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	ST MARKS	STMKFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	STARKE	STRKFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	TALLAHASSEE	TLHSFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	TALLAHASSEE	TLHSFLXB	YES
SPRINT-FLORIDA INC. DBA CENTRAL	TALLAHASSEE	TLHSFLXC	YES
SPRINT-FLORIDA INC. DBA CENTRAL	TALLAHASSEE	TLHSFLXD	YES
SPRINT-FLORIDA INC. DBA CENTRAL	TALLAHASSEE	TLHSFLXF	YES
SPRINT-FLORIDA INC. DBA CENTRAL	TALLAHASSEE	TLHSFLXG	YES
SPRINT-FLORIDA INC. DBA CENTRAL	TALLAHASSEE	TLHSFLXH	YES
SPRINT-FLORIDA INC. DBA CENTRAL	NICEVILLE	VLPRFLXA	YES
SPRINT-FLORIDA INC. DBA CENTRAL	WESTVILLE	WSTVFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	ALTAMONTE SPGS	ALSPFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	APOPKA	APPKFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	ARCADIA	ARCDLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	ASTOR	ASTRFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	CLERMONT	CLMTFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	CLEWISTON	CLTNFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	CASSELBERRY	CSLBFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	EUSTIS	ESTSFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	OCHOPEE	EVRGFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	WINTER PK	GLRDFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	GROVELAND	GVLDLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	HOWEY IN THE HLS	HOWYFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	KENANSVILLE	KNVLFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	KISSIMMEE	KSSMFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	KISSIMMEE	KSSMFLXB	NO
SPRINT-FLORIDA INC. DBA UNITED	KISSIMMEE	KSSMFLXD	NO
SPRINT-FLORIDA INC. DBA UNITED	LABELLE	LBLLFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	ALTAMONTE SPGS	LKBRFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	LK HELEN	LKHLFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	LK PLACID	LKPCFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	LEESBURG	LSBGFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	MOORE HAVEN	MRHNFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	MT DORA	MTDRFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	MAITLAND	MTLDLTC	NO
SPRINT-FLORIDA INC. DBA UNITED	ORLANDO	MTLDLXA	NO

**ALLTEL COMMUNICATIONS, INC.
PARTIALLY SERVED RURAL STUDY AREAS**

LEC NAME	WIRE CENTER NAME	CLLI CODE	SERVED
SPRINT-FLORIDA INC. DBA UNITED	MONTVERDE	MTVRFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	NAPLES	NPLSFLXC	NO
SPRINT-FLORIDA INC. DBA UNITED	SILVER SPGS	OCNFFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	OKEECHOBEE	OKCBFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	ORANGE CITY	ORCYFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	DELTONA	ORCYFLXC	NO
SPRINT-FLORIDA INC. DBA UNITED	PUNTA GORDA	PNGRFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	SEBRING	SLHLFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	SALT SPRINGS	SSPRFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	ST CLOUD	STCDFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	TAVARES	TVRSFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	UMATILLA	UMTLFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	WINDERMERE	WNDRFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	WINTER GDN	WNGRFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	WINTER PK	WNPKFLXA	NO
SPRINT-FLORIDA INC. DBA UNITED	ALVA	ALVAFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	AVON PK	AVPKFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	BOCA GRANDE	BCGRFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	BELLEVIEW	BLVWFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	BONITA SPGS	BNSPFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	BUSHNELL	BSHNFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	BEVERLY HLS	BVHLFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	BOWLING GRN	BWLGFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	HOMOSASSA	CHSWFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	CAPE CORAL	CPCRFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	CAPE CORAL	CPCRFLXB	YES
SPRINT-FLORIDA INC. DBA UNITED	ROTONDA W	CPHZFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	CRYSTAL RIV	CRRVFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	FT MYERS	CYLKFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	FT MYERS	CYLKFLXB	YES
SPRINT-FLORIDA INC. DBA UNITED	DADE CITY	DDCYFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	FT MYERS BCH	FTMBFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	FT MEADE	FTMDFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	FT MYERS	FTMYFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	FT MYERS	FTMYFLXB	YES
SPRINT-FLORIDA INC. DBA UNITED	FT MYERS	FTMYFLXC	YES
SPRINT-FLORIDA INC. DBA UNITED	NAPLES	GLGCFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	HOMOSASSA	HMSPFLLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	IMMOKALEE	IMKLFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	INVERNESS	INVRFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	FT MYERS	IONAFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	LADY LK	LDLKFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	LEHIGH ACRES	LHACFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	MARCO IS	MOISFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	PRT CHARLOTTE	MRDCFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	N FT MYERS	NFMYFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	N FT MYERS	NFMYFLXB	YES
SPRINT-FLORIDA INC. DBA UNITED	NAPLES	NNPLFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	NAPLES	NPLSFLXD	YES

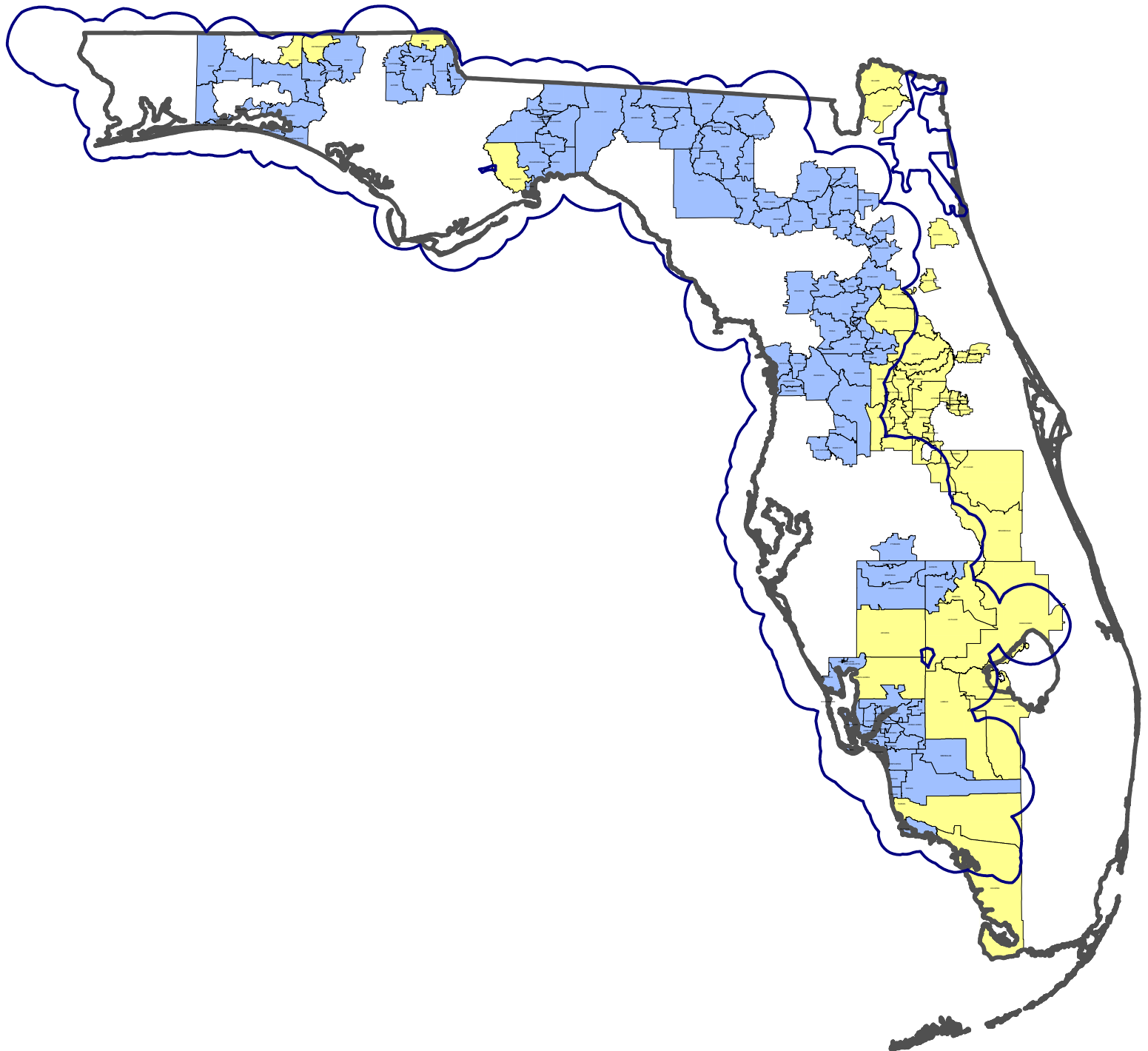
**ALLTEL COMMUNICATIONS, INC.
PARTIALLY SERVED RURAL STUDY AREAS**

LEC NAME	WIRE CENTER NAME	CLLI CODE	SERVED
SPRINT-FLORIDA INC. DBA UNITED	OCALA	OCALFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	OCALA	OCALFLXB	YES
SPRINT-FLORIDA INC. DBA UNITED	OCALA	OCALFLXC	YES
SPRINT-FLORIDA INC. DBA UNITED	OCALA	OCALFLXJ	YES
SPRINT-FLORIDA INC. DBA UNITED	OCKLAWAHA	OKLWFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	PINE ISLAND	PNISFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	PRT CHARLOTTE	PTCTFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	SEBRING	SBNGFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	FT MYERS	SCPFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	SAN ANTONIO	SNANFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	SANIBEL	SNISFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	SILVER SPGS	SVSPFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	OCALA	SVSSFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	DADE CITY	TLCHFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	WAUCHULA	WCHLFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	WILLISTON	WLSTFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	WILDWOOD	WLWDFLXA	YES
SPRINT-FLORIDA INC. DBA UNITED	ZOLFO SPRINGS	ZLSPFLXA	YES

EXHIBIT G-1

**MAP ILLUSTRATING WIRE CENTERS
WITHIN RURAL STUDY AREAS
THAT ARE NOT SERVED IN THEIR ENTIRETY**

Alltel Communications, Inc.
State of Florida



- Wire centers served by Alltel in partially served rural study areas
- Wire centers not served by Alltel in partially served rural study areas

EXHIBIT G-2

**MAP ILLUSTRATING
INCUMBENT LEC STUDY AREAS
THAT ARE NOT SERVED IN THEIR ENTIRETY**



- Source: Claritas Compass

EXHIBIT H

DENSITY ANALYSIS

Alltel Communications, Inc.
Population Density Analysis of Partially Served Rural Study Areas

STUDY AREA NAME	WIRE CENTER NAME	CLLI CODE	SERVED BY ALLTEL	POPULATION	AREA IN SQ MILES	DENSITY
ALLTEL FLORIDA INC.	CALLAHAN	CLHNFLXA	NO	15366	199.79	76.91
ALLTEL FLORIDA INC.	CRESCENT CITY	CRCYFLXA	NO	4826	41.91	115.14
ALLTEL FLORIDA INC.	HILLIARD	HLRDFLXA	NO	8518	198.17	42.98
ALLTEL FLORIDA INC.	HASTINGS	HSNGFLXA	NO	4113	93.57	43.96
AVERAGE DENSITY OF "NOT SERVED"				32823	533.44	61.53
ALLTEL FLORIDA INC.	ALACHUA	ALCHFLXA	YES	12840	143.83	89.27
ALLTEL FLORIDA INC.	BOYS RANCH	BORAFSLXA	YES	1317	47.16	27.93
ALLTEL FLORIDA INC.	BRANFORD	BRFRFLXA	YES	8322	191.74	43.40
ALLTEL FLORIDA INC.	BROOKER	BRKRFLXA	YES	3358	108.97	30.81
ALLTEL FLORIDA INC.	CITRA	CITRFLXA	YES	3890	30.17	128.92
ALLTEL FLORIDA INC.	DOWLING PARK	DWPKFLXA	YES	2566	44.29	57.94
ALLTEL FLORIDA INC.	FLORAHOME	FLRHFLXA	YES	2125	55.90	38.01
ALLTEL FLORIDA INC.	FORT WHITE	FTWHFLXA	YES	6854	100.45	68.23
ALLTEL FLORIDA INC.	HIGH SPGS	HGSPFLXA	YES	10575	138.07	76.59
ALLTEL FLORIDA INC.	INTERLACHEN	INTRFLXA	YES	14952	110.84	134.89
ALLTEL FLORIDA INC.	JENNINGS	JNGSFLXA	YES	4618	157.60	29.30
ALLTEL FLORIDA INC.	JASPER	JSPRFLXA	YES	7724	239.91	32.20
ALLTEL FLORIDA INC.	LAKE BUTLER	LKBTFLXA	YES	9807	165.29	59.33
ALLTEL FLORIDA INC.	LURAVILLE	LRVLFLXA	YES	3284	107.29	30.61
ALLTEL FLORIDA INC.	LIVE OAK	LVOKFLXA	YES	19716	262.70	75.05
ALLTEL FLORIDA INC.	MAYO	MAYOFLXA	YES	7508	543.26	13.82
ALLTEL FLORIDA INC.	REDDICK	MCINFLXA	YES	7620	100.26	76.00
ALLTEL FLORIDA INC.	MELROSE	MLRSFLXA	YES	3296	61.72	53.40
ALLTEL FLORIDA INC.	FT MC COY	ORSPFLXA	YES	4666	137.87	33.84
ALLTEL FLORIDA INC.	RAIFORD	RAFRFLXA	YES	2968	37.31	79.55
ALLTEL FLORIDA INC.	WALDO	WALDFLXA	YES	3679	66.74	55.13
ALLTEL FLORIDA INC.	WHITE SPGS	WHSPFLXA	YES	2183	117.35	18.60
ALLTEL FLORIDA INC.	WELLBORN	WLBRFLXA	YES	4028	100.54	40.07
AVERAGE DENSITY OF "SERVED"				147896	3069.27	48.19
SPRINT-FLORIDA INC.	ALTAMONTE SPGS	ALSPFLXA	NO	67129	20.06	3347.25
SPRINT-FLORIDA INC.	APOPKA	APPKFLXA	NO	67722	97.74	692.91
SPRINT-FLORIDA INC.	ARCADIA	ARCDLFLXA	NO	33320	645.46	51.62
SPRINT-FLORIDA INC.	ASTOR	ASTRFLXA	NO	2056	44.16	46.56
SPRINT-FLORIDA INC.	CLERMONT	CLMTFLXA	NO	38395	141.07	272.18
SPRINT-FLORIDA INC.	CLEWISTON	CLTNFLXA	NO	17422	413.01	42.18
SPRINT-FLORIDA INC.	CASSELBERRY	CSLBFLXA	NO	41657	14.74	2826.89
SPRINT-FLORIDA INC.	EUSTIS	ESTSFLXA	NO	28881	128.52	224.71
SPRINT-FLORIDA INC.	OCHOPEE	EVRGFLXA	NO	1698	1201.42	1.41
SPRINT-FLORIDA INC.	WINTER PK	GLRDFLXA	NO	77806	21.21	3668.88
SPRINT-FLORIDA INC.	GROVELAND	GVLDLFLXA	NO	12251	144.97	84.51
SPRINT-FLORIDA INC.	HOWEY IN THE HLS	HOWYFLXA	NO	5283	14.81	356.81
SPRINT-FLORIDA INC.	KENANSVILLE	KNVLFLXA	NO	1144	414.91	2.76
SPRINT-FLORIDA INC.	KISSIMMEE	KSSMFLXA	NO	92655	127.18	728.52
SPRINT-FLORIDA INC.	KISSIMMEE	KSSMFLXB	NO	25716	72.44	355.01
SPRINT-FLORIDA INC.	KISSIMMEE	KSSMFLXD	NO	37495	19.51	1921.44
SPRINT-FLORIDA INC.	LABELLE	LBLLFLXA	NO	22840	788.23	28.98
SPRINT-FLORIDA INC.	ALTAMONTE SPGS	LKBRFLXA	NO	63286	22.64	2795.19
SPRINT-FLORIDA INC.	LK HELEN	LKHLFLXA	NO	4325	74.46	58.09
SPRINT-FLORIDA INC.	LK PLACID	LKPCFLXA	NO	21411	426.29	50.23
SPRINT-FLORIDA INC.	LEESBURG	LSBGFLXA	NO	53580	111.11	482.23
SPRINT-FLORIDA INC.	MOORE HAVEN	MRHNFLXA	NO	4764	262.57	18.14
SPRINT-FLORIDA INC.	MT DORA	MTDRFLXA	NO	28036	121.43	230.88
SPRINT-FLORIDA INC.	MAITLAND	MTLDLFLXA	NO	124	0.00	0.00
SPRINT-FLORIDA INC.	ORLANDO	MTLDFLXA	NO	5537	1.89	2931.18
SPRINT-FLORIDA INC.	MONTVERDE	MTVRFLXA	NO	2979	12.53	237.79
SPRINT-FLORIDA INC.	NAPLES	NPLSFLXC	NO	57805	779.04	74.20
SPRINT-FLORIDA INC.	SILVER SPGS	OCNFFLXA	NO	11433	187.52	60.97
SPRINT-FLORIDA INC.	OKEECHOBEE	OKCBFLXA	NO	41603	1106.64	37.59
SPRINT-FLORIDA INC.	ORANGE CITY	ORCYFLXA	NO	19166	24.20	792.02
SPRINT-FLORIDA INC.	DELTONA	ORCYFLXC	NO	37303	24.67	1512.08
SPRINT-FLORIDA INC.	PUNTA GORDA	PNGRFLXA	NO	35446	342.86	103.38
SPRINT-FLORIDA INC.	SEBRING	SBNGFLXA	NO	37619	210.37	178.82

Alltel Communications, Inc.
Population Density Analysis of Partially Served Rural Study Areas

STUDY AREA NAME	WIRE CENTER NAME	CLLI CODE	SERVED BY ALLTEL	POPULATION	AREA IN SQ MILES	DENSITY
SPRINT-FLORIDA INC.	SALT SPRINGS	SSPRFLXA	NO	2547	107.53	23.69
SPRINT-FLORIDA INC.	ST CLOUD	STCDFLXA	NO	46153	690.56	66.83
SPRINT-FLORIDA INC.	TAVARES	TVRSFLXA	NO	21482	49.86	430.86
SPRINT-FLORIDA INC.	UMATILLA	UMTLFLXA	NO	20104	242.02	83.07
SPRINT-FLORIDA INC.	WINDERMERE	WNDRFLXA	NO	18516	19.29	959.98
SPRINT-FLORIDA INC.	WINTER GDN	WNGRFLXA	NO	53645	95.00	564.67
SPRINT-FLORIDA INC.	WINTER PK	WNPKFLXA	NO	46647	15.66	2979.31
AVERAGE DENSIT Y OF "NOT SERVED"				1206981	9237.56	130.66
SPRINT-FLORIDA INC.	ALFORD	ALFRFLXA	YES	3929	107.31	36.61
SPRINT-FLORIDA INC.	ALVA	ALVAFLLXA	YES	2705	21.69	124.71
SPRINT-FLORIDA INC.	AVON PK	AVPKFLXA	YES	22542	115.12	195.82
SPRINT-FLORIDA INC.	BAKER	BAKRFLXA	YES	7114	234.33	30.36
SPRINT-FLORIDA INC.	BOCA GRANDE	BCGRFLXA	YES	1238	2.12	584.51
SPRINT-FLORIDA INC.	BELLEVIEW	BLVWFLXA	YES	46193	118.31	390.46
SPRINT-FLORIDA INC.	BONIFAY	BNFYFLXA	YES	12991	244.51	53.13
SPRINT-FLORIDA INC.	BONITA SPGS	BNSPFLXA	YES	52734	94.85	555.99
SPRINT-FLORIDA INC.	BUSHNELL	BSHNFLXA	YES	21995	351.78	62.52
SPRINT-FLORIDA INC.	BEVERLY HLS	BVHLFLXA	YES	22945	55.86	410.77
SPRINT-FLORIDA INC.	BOWLING GRN	BWLGLFLXA	YES	6085	28.73	211.77
SPRINT-FLORIDA INC.	CRAWFORDVILLE	CFVLFLXA	YES	14355	311.40	46.10
SPRINT-FLORIDA INC.	CHERRY LAKE	CHLKFLXA	YES	3973	168.37	23.60
SPRINT-FLORIDA INC.	HOMOSASSA	CHSWFLXA	YES	7905	36.54	216.33
SPRINT-FLORIDA INC.	CAPE CORAL	CPCRFLXA	YES	53194	27.03	1967.74
SPRINT-FLORIDA INC.	CAPE CORAL	CPCRFLXB	YES	54909	46.52	1180.36
SPRINT-FLORIDA INC.	ROTONDA W	CPHZFLXA	YES	18042	76.51	235.82
SPRINT-FLORIDA INC.	CRYSTAL RIV	CRRVFLXA	YES	22435	136.86	163.92
SPRINT-FLORIDA INC.	CRESTVIEW	CRVWFLXA	YES	35574	186.46	190.78
SPRINT-FLORIDA INC.	COTTONDALE	CTDLFLXA	YES	2957	81.43	36.31
SPRINT-FLORIDA INC.	FT MYERS	CYLKFLXA	YES	42724	34.14	1251.51
SPRINT-FLORIDA INC.	FT MYERS	CYLKFLXB	YES	14529	39.85	364.56
SPRINT-FLORIDA INC.	DADE CITY	DDCYFLXA	YES	25219	159.86	157.76
SPRINT-FLORIDA INC.	DESTIN	DESTFLXA	YES	13774	15.51	887.84
SPRINT-FLORIDA INC.	DEFUNIAK SPGS	DFSPFLXA	YES	19210	453.72	42.34
SPRINT-FLORIDA INC.	EGLIN FIELD	ELFDFLXA	YES	3341	0.00	0.00
SPRINT-FLORIDA INC.	FREEPORT	FRPTFLXA	YES	6638	181.89	36.49
SPRINT-FLORIDA INC.	FT MYERS BCH	FTMBFLXA	YES	8035	3.43	2341.20
SPRINT-FLORIDA INC.	FT MEADE	FTMDFLXA	YES	8316	136.04	61.13
SPRINT-FLORIDA INC.	FT MYERS	FTMYFLXA	YES	25054	13.22	1895.02
SPRINT-FLORIDA INC.	FT MYERS	FTMYFLXB	YES	32781	82.44	397.65
SPRINT-FLORIDA INC.	FT MYERS	FTMYFLXC	YES	39027	17.94	2175.66
SPRINT-FLORIDA INC.	FT WALTON BCH	FTWBFLXA	YES	22371	174.63	128.11
SPRINT-FLORIDA INC.	FT WALTON BCH	FTWBFLXB	YES	35108	129.14	271.86
SPRINT-FLORIDA INC.	MARY ESTHER	FTWBFLXC	YES	8136	25.51	318.92
SPRINT-FLORIDA INC.	GRAND RDG	GDRGFLXA	YES	3649	148.10	24.64
SPRINT-FLORIDA INC.	GLENDALE	GLDLFLXA	YES	1920	112.15	17.12
SPRINT-FLORIDA INC.	NAPLES	GLGCFLXA	YES	60449	539.29	112.09
SPRINT-FLORIDA INC.	GREENVILLE	GNVLFLXA	YES	3610	246.56	14.64
SPRINT-FLORIDA INC.	GREENWOOD	GNWDFLXA	YES	3893	58.61	66.42
SPRINT-FLORIDA INC.	HOMOSASSA	HMSPFLLXA	YES	15503	71.00	218.37
SPRINT-FLORIDA INC.	HURLBURT FIELD	HRFDFLAJ	YES	1853	0.00	0.00
SPRINT-FLORIDA INC.	HURLBURT FIELD	HRFDFLXA	YES	264	0.00	0.00
SPRINT-FLORIDA INC.	IMMOKALEE	IMKLFLXA	YES	24933	575.82	43.30
SPRINT-FLORIDA INC.	INVERNESS	INVRFLXA	YES	46899	226.83	206.76
SPRINT-FLORIDA INC.	FT MYERS	IONAFLXA	YES	17055	21.81	782.05
SPRINT-FLORIDA INC.	KINGSLEY LAKE	KGLKFLXA	YES	441	17.69	24.93
SPRINT-FLORIDA INC.	LADY LK	LDLKFLXA	YES	36719	74.26	494.49
SPRINT-FLORIDA INC.	LEE	LEE FLXA	YES	3007	182.71	16.46
SPRINT-FLORIDA INC.	LEHIGH ACRES	LHACFLXA	YES	35975	122.29	294.17
SPRINT-FLORIDA INC.	LAWTEY	LWTFLLXA	YES	6196	77.89	79.54
SPRINT-FLORIDA INC.	MALONE	MALNFLXA	YES	3940	104.47	37.71
SPRINT-FLORIDA INC.	MADISON	MDSNFLXA	YES	9029	105.07	85.93
SPRINT-FLORIDA INC.	MONTICELLO	MNTIFLXA	YES	12240	549.58	22.27
SPRINT-FLORIDA INC.	MARCO IS	MOISFLXA	YES	16937	68.19	248.39

Alltel Communications, Inc.
Population Density Analysis of Partially Served Rural Study Areas

STUDY AREA NAME	WIRE CENTER NAME	CLLI CODE	SERVED BY ALLTEL	POPULATION	AREA IN SQ MILES	DENSITY
SPRINT-FLORIDA INC.	PRT CHARLOTTE	MRDCLXA	YES	1429	2.19	652.21
SPRINT-FLORIDA INC.	MARIANNA	MRNNFLXA	YES	18692	204.39	91.45
SPRINT-FLORIDA INC.	N FT MYERS	NFMYFLXA	YES	26120	14.32	1824.53
SPRINT-FLORIDA INC.	N FT MYERS	NFMYFLXB	YES	27730	260.38	106.50
SPRINT-FLORIDA INC.	NAPLES	NNPLFLXA	YES	63666	54.31	1172.31
SPRINT-FLORIDA INC.	NAPLES	NPLSFLXD	YES	56584	24.33	2325.50
SPRINT-FLORIDA INC.	OCALA	OCALFLXA	YES	78089	243.88	320.19
SPRINT-FLORIDA INC.	OCALA	OCALFLXB	YES	46816	176.91	264.63
SPRINT-FLORIDA INC.	OCALA	OCALFLXC	YES	10404	6.49	1604.07
SPRINT-FLORIDA INC.	OCALA	OCALFLXJ	YES	7832	5.41	1447.42
SPRINT-FLORIDA INC.	OCKLAWAHA	OKLWFLXA	YES	7938	65.72	120.78
SPRINT-FLORIDA INC.	PANACEA	PANCFLLXA	YES	2979	35.41	84.12
SPRINT-FLORIDA INC.	PINE ISLAND	PNISFLXA	YES	16042	80.81	198.52
SPRINT-FLORIDA INC.	PONCE DE LEON	PNLNFLXA	YES	2700	142.12	19.00
SPRINT-FLORIDA INC.	PRT CHARLOTTE	PTCTFLXA	YES	79660	92.56	860.59
SPRINT-FLORIDA INC.	REYNOLDS HILL	RYHLFLXA	YES	2394	133.35	17.95
SPRINT-FLORIDA INC.	FT MYERS	SCPKFLXA	YES	23396	65.11	359.34
SPRINT-FLORIDA INC.	SANTA ROSA BEACH	SGBHFLXA	YES	3160	47.75	66.17
SPRINT-FLORIDA INC.	SHALIMAR	SHLMFLXA	YES	18758	34.42	545.02
SPRINT-FLORIDA INC.	SEBRING	SLHLFLXA	YES	8074	147.10	54.89
SPRINT-FLORIDA INC.	SAN ANTONIO	SNANFLXA	YES	4440	51.68	85.91
SPRINT-FLORIDA INC.	SNEADS	SNDSFLXA	YES	5437	51.62	105.33
SPRINT-FLORIDA INC.	SANIBEL	SNISFLXA	YES	6366	18.48	344.52
SPRINT-FLORIDA INC.	SANTA ROSA BCH	SNRSFLXA	YES	8216	38.06	215.89
SPRINT-FLORIDA INC.	SOPCHOPPY	SPCPFLXA	YES	2075	108.77	19.08
SPRINT-FLORIDA INC.	ST MARKS	STMKFLXA	YES	1123	31.34	35.83
SPRINT-FLORIDA INC.	STARKE	STRKFLXA	YES	16484	106.14	155.30
SPRINT-FLORIDA INC.	SILVER SPGS	SVSPFLXA	YES	10304	55.92	184.26
SPRINT-FLORIDA INC.	OCALA	SVSSFLXA	YES	15166	42.81	354.24
SPRINT-FLORIDA INC.	DADE CITY	TLCHFLXA	YES	7463	54.03	138.13
SPRINT-FLORIDA INC.	TALLAHASSEE	TLHSFLXA	YES	30340	7.24	4192.34
SPRINT-FLORIDA INC.	TALLAHASSEE	TLHSFLXB	YES	32281	15.69	2057.56
SPRINT-FLORIDA INC.	TALLAHASSEE	TLHSFLXC	YES	47032	211.51	222.36
SPRINT-FLORIDA INC.	TALLAHASSEE	TLHSFLXD	YES	67187	143.66	467.69
SPRINT-FLORIDA INC.	TALLAHASSEE	TLHSFLXF	YES	48898	197.82	247.18
SPRINT-FLORIDA INC.	TALLAHASSEE	TLHSFLXG	YES	12380	198.23	62.45
SPRINT-FLORIDA INC.	TALLAHASSEE	TLHSFLXH	YES	20981	32.44	646.80
SPRINT-FLORIDA INC.	NICEVILLE	VLPRFLXA	YES	34566	12.96	2666.92
SPRINT-FLORIDA INC.	WAUCHULA	WCHLFLXA	YES	16372	288.72	56.71
SPRINT-FLORIDA INC.	WILLISTON	WLSTFLXA	YES	13534	210.05	64.43
SPRINT-FLORIDA INC.	WILDWOOD	WLWDFLXA	YES	22301	171.45	130.07
SPRINT-FLORIDA INC.	WESTVILLE	WSTVFLXA	YES	239	49.21	4.86
SPRINT-FLORIDA INC.	ZOLFO SPRINGS	ZLSPFLXA	YES	5147	291.51	17.66
AVERAGE DENSITY OF "SERVED"				1953385	11441.66	170.73
AVERAGE DENSITY OF ALL "NOT SERVED"				1239804	9771.00	126.89
AVERAGE DENSITY OF ALL "SERVED"				2101281	14510.94	144.81

EXHIBIT I

HIGH-COST CERTIFICATION

EXHIBIT I

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20037

Ms. Irene Flannery
2120 L Street, N.W.
Suite 600
Washington, DC 20037

Re: Alltel Communications, Inc.
High Cost Certification
Docket No. 96-45

Dear Ms. Dortch and Ms. Flannery:

On behalf of Alltel Communications, Inc. and in connection with its application before the FCC for status as an eligible telecommunications carrier in the State of Florida, we hereby forward the attached certification for high-cost support under the Universal Service program pursuant to Sections 54.313 and 54.314 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read 'Glenn S. Rabin', is written over a horizontal line.

Glenn S. Rabin
Vice President
Federal Communications Counsel
Alltel Corporation
601 Pennsylvania Avenue, N.W.
Suite 720
Washington, D.C. 20004
(202) 783-3970

EXHIBIT I

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20037

Ms. Irene Flannery
2120 L Street, N.W.
Suite 600
Washington, DC 20037

Re: Alltel Communications, Inc. Certification or High Cost Loop Support

Dear Ms. Dortch and Ms. Flannery:

This certification is submitted on behalf of Alltel Communications, Inc. ("Alltel" or the "Company") in connection with its application before the FCC for status as an eligible telecommunications carrier in the State of Florida and in accordance with Sections 54.313 and 54.314 of the Commission's rules. On behalf of Alltel, I hereby certify under penalty of perjury that all high-cost support provided to the Company will be used for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996.

Alltel Communications, Inc.


Glenn S. Rabin

Vice President

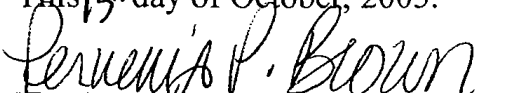
Federal Communications Counsel

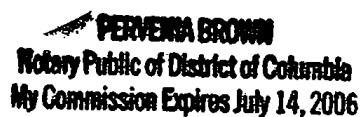
Authorized Representative

Alltel Corporation
601 Pennsylvania Avenue, N.W.
Suite 720
Washington, D.C. 20004
(202) 783-3970

Date: October 13, 2005

Subscribed and sworn to before me
This 15th day of October, 2005.


Notary Public


PERUVIA BROWN
Notary Public of District of Columbia
My Commission Expires July 14, 2006